PRATT PROPERTY CLOSURE PLAN

TABLE OF CONTENTS

1.0 INTRODUCTION

Laidlaw Waste Systems, Inc. (Laidlaw) acquired the Western Landfill, located in Weld County, Colorado on January 1, 1988. The site is now referred to as the Laidlaw South Landfill. Prior to ownership by Western Disposal, Western Landfill was owned by Colorado Landfill Inc. and operated under the name of Southwest Weld County Landfill. The 160 acre site, received approval for the Use by Special Review permit and a Certificate of Designation (CD) and was opened in 1979.

During operation of the landfill, the Pratt Property, an adjacent landfill operation, was acquired and operated by Colorado Landfill, Inc. The Pratt Property, approximately 25 acres, was opened in 1964 and operated until 1969. The adjacent Pratt Property was, at that time, an inactive open dump.

Colorado Landfill, Inc. renewed operations at the Pratt Property under a separate Use by Special Review permit and CD with the intention of filling it to elevations consistent with the Southwest Weld County Landfill design and closing it in an environmentally acceptable manner. The requirements of the CD's for Southwest Weld County Landfill and the Pratt Property remained in force through the ownership by Western Disposal and subsequent acquisition by Laidlaw. Currently, the Pratt Property has been completely filled, covered and brought up to final grade. Laidlaw has committed to methane venting, revegetation and monitoring of the Pratt Property in accordance with the permit requirements.

This report details the remaining activities that must be completed to properly close the Pratt Property site. The closure plan addresses the following Use by Special Review operation standards:

* Ground-water monitoring (Standard 5)
* Methane venting (Standard 15)
* Revegetation of the Pratt Property (Standard 17)
* Subsidence monitoring (Standard 19)

The document presents detailed procedures for meeting the above operations standards to submit to the Weld County Board of Commissioners.

2.0 GROUND WATER MONITORING

This report section presents a ground-water monitoring plan to be implemented by Laidlaw at the current Western Landfill and Pratt Property. The two properties are being monitored under one program because the sites are adjacent to each other. The purpose of the monitoring program is to evaluate water quality beneath the landfill. The program is consistent with the regulations and accepted protocols as set by the Colorado Department of Health (CDH) and the Weld County Use by Special Review permit. The plan and an amendment is included as Attachment A.

The landfill is on the northwestern flank of the Denver Basin, a large structural basin that contains important ground-water resources in the upper portion as well as economic oil and gas reserves at depth. Laboratory testing indicates that both the surficial and bedrock materials underlying the site have extremely low permeabilities. Fractured coal beds may have more moderate permeabilities. The near-surface materials found beneath the site are generally unsaturated. The exception to this is the area beneath the drainage that transect the abandoned and active portions of the landfill. Materials located here are saturated to differing depths and probably represent discrete pockets of perched water.

The probability of impacting potentially usable ground waters in the coal and in the Laramie-Fox Hills (L-F) Aquifer (the shallowest ground-water source besides the surficial ground waters) is negligible. Nearly 200 feet of materials with permeabilities less than 1 10^{-7} cm/sec should hydraulically isolate the near surface waters from the coals. An additional 250 feet of similar materials provide adequate protection for the L-F Aquifer. The only ground-water migration pathway that may pose a potential threat is the near surface materials found beneath the gully. The current monitoring system at the Laidlaw South Landfill provides an adequate program for the Pratt Property.

Laidlaw will continue to contract with an independent firm to complete the monitoring results on a quarterly basis and conduct a statistical analysis. The independent contractor will also forward the results to CDH and Weld County, if Laidlaw considers it appropriate.

3.0 METHANE VENTING

3.1 Introduction

Operational standard 15 of the USR states:

> "At closure, the applicant shall install methane venting on two hundred (200) feet centers in areas of the fill where its thickness is greater than ten (10) feet."

The operations plan for the landfill contained the following vent description:

> " For solid waste fill areas in excess of 10 foot total depth, well vents will be installed in a grid pattern at 200 foot spacing to within 2 feet of the bottom of the fill. Well vents shall be at least 12 inches in diameter, backfilled with clean coarse gravel around a 2 inch perforated plastic pipe. Each vent pipe shall be open to the atmosphere and marked by installing a standard steel fence post adjacent to the vent."

Laidlaw is exploring the possibility of installing an active methane venting system at the Pratt Property. The well construction of the passive system will incorporate the fittings necessary to retrofit it for active methane vents.

3.2 Vent Design Considerations

Vents installed in 8-inch diameter holes will provide the same approximate gas recovery potential as 12-inch diameter holes. The following evidence is cited as proof:

First, the Thiem equation for flow to a well is

$$Q=[2* *k*D*(h_2-h_1)]/[\ln(r_2/r_1)] :$$

Where r_2 and r_1 are the radius of influence and the radius of the well respectively. If we assume a radius of influence of 100 feet, the radius for wells placed on 200-foot centers, the results for differing well radii are:

Well radius (r_2)	3"	4"	5"	6"
Well diameter	6"	8"	10"	12"
$\ln(100/r_2)$	5.99	5.70	5.48	5.30

If we assume all other terms are approximately equivalent,

and this is a safe assumption for a passive venting system, then the theoretical flow rate for an 8-inch vent would be 93% of the rate for a 12-inch vent.

Second, the relative permeability of the uncompacted refuse is approximately equivalent to that of a pea gravel. A number of slug tests were completed on monitor wells completed in uncompacted refuse in an old dump with a history similar to that of the original Pratt dump. The representative hydraulic conductivity (k in the above equation) was $7x10^{-3}$ centimeters per second (cm/s) (Fox Consultants, Inc. 1984). The U.S. Bureau of Reclamation estimates the hydraulic conductivity of a pea gravel at about $1x10^{-1}$ cm/sec, a difference of only 14. For a passive venting system, where no artificial vacuum is applied, the additional two radial inches of refuse in a 8-inch diameter well will not substantially retard the flow of methane gas to the vent.

3.3 Vent Design

The methane venting system will be built to allow retrofitting an active system to the initially installed passive system and will have vents placed on a 200 foot grid over the Pratt Property. The vents will be 8-inch borings advanced to within 2 feet of the base of the trash or to the water table, whichever is reached first. PVC pipe with 4-inch diameters will be placed in these borings with perforated or slotted casing beginning within 2 feet of the bottom of the landfill cap and continuing to approximately 2 feet above the base of the boring. The PVC pipe will have a tee approximately two feet beneath the surface of the landfill that is capped and can be retrofitted to install a manifold system for an active venting system. The annular space of the boring will be filled with pea gravel to a point above the tee. A 1 to 2 foot clay seal will be placed on the pea gravel and the remaining space to the top of the boring will be compacted fill material. Figure 3.1 is a diagram of the passive system and Figure 3.2 is a diagram showing the

Figure 3.1 - Passive Methane Venting

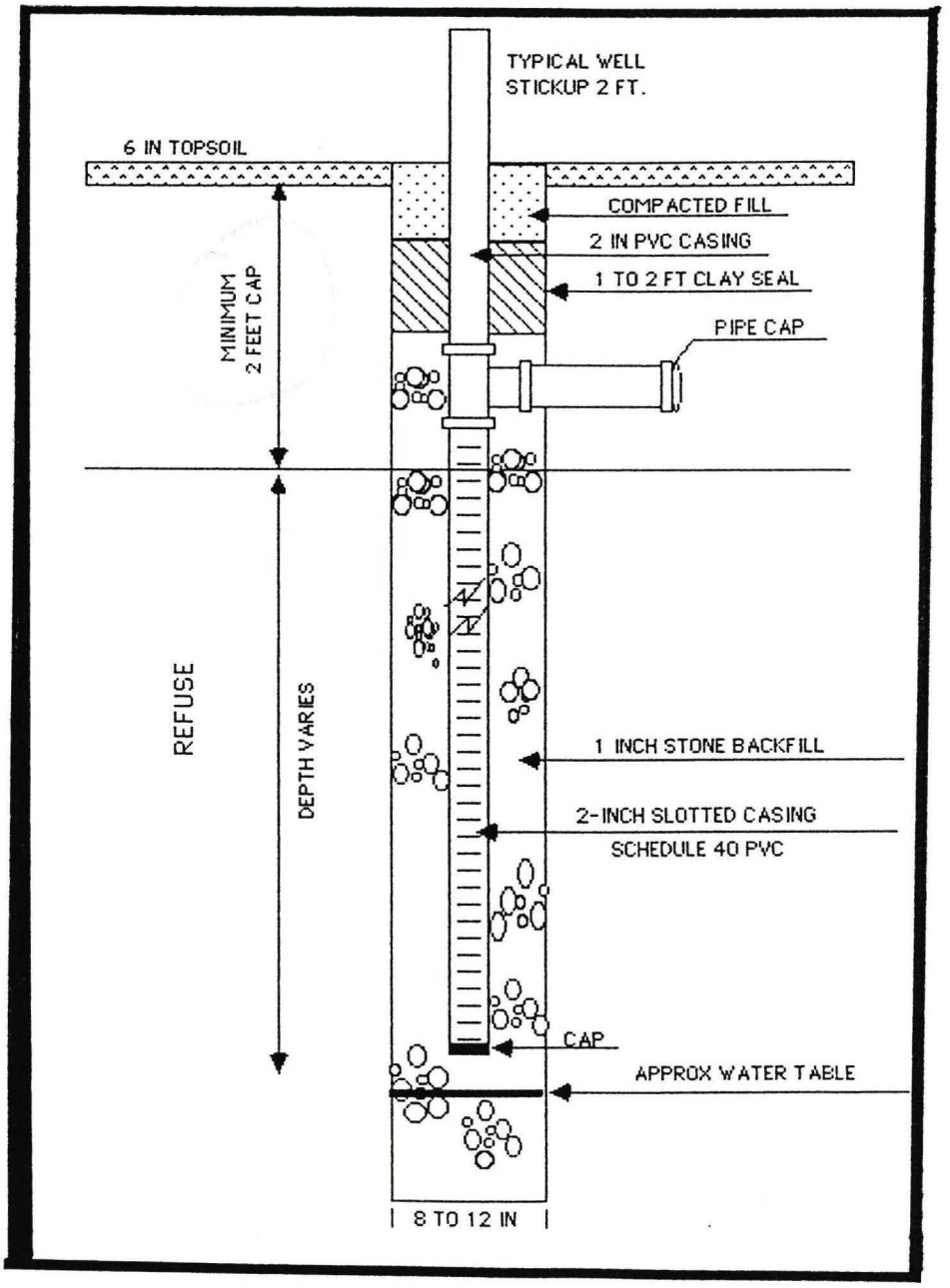


Figure 3.2 - Active Methane Venting System

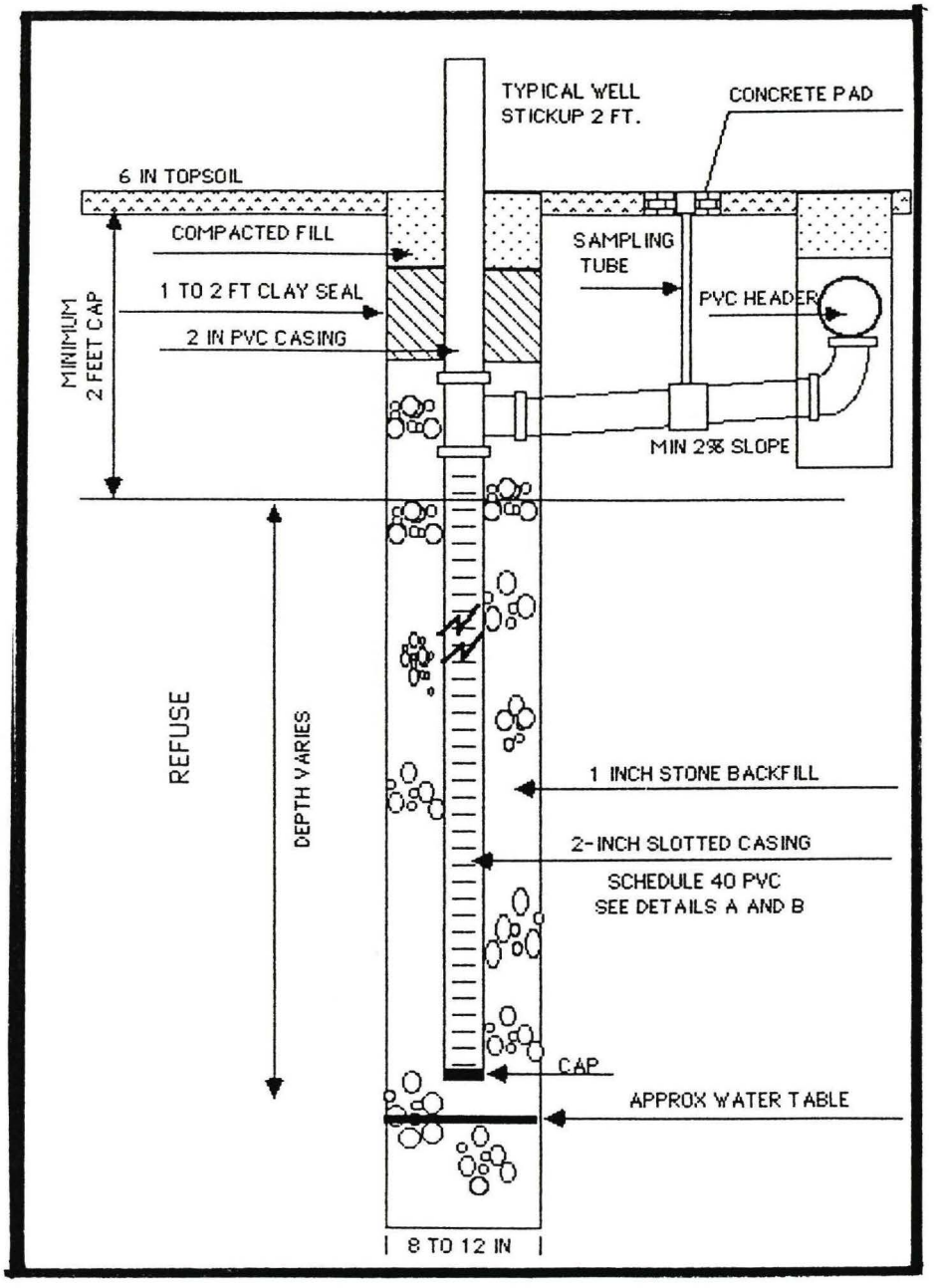
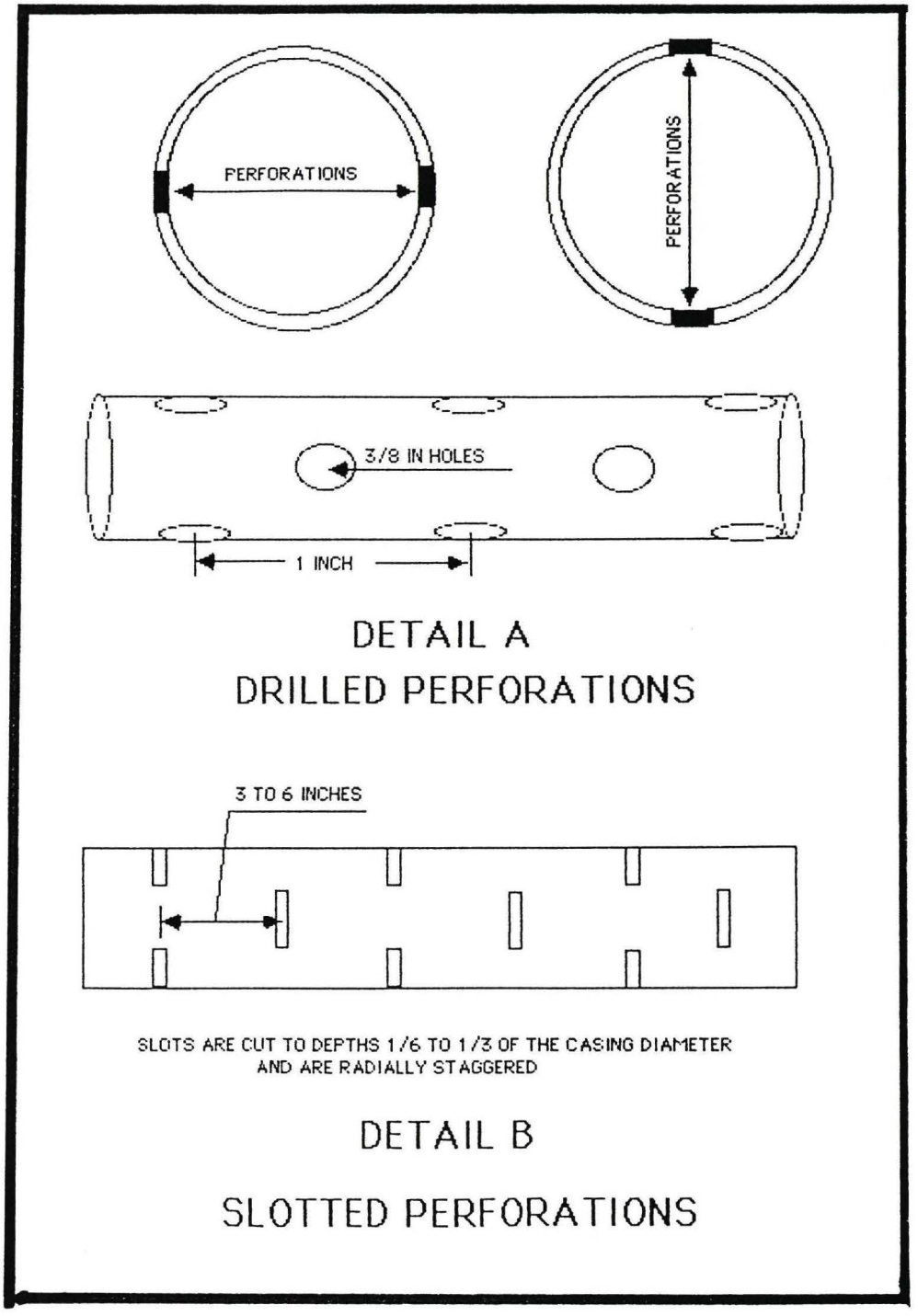


Figure 3.3 - Perforation and Slotting Patterns



active system after retrofitting. Figure 3.3 shows perforation and slotting patterns. Either type of pattern is acceptable and will be chosen by the installer.

The methane venting system will be installed in accordance with the standards set by Weld County. If Laidlaw chooses to use an active system, more detailed design work will be completed and submitted for review by both Weld County and the Colorado Department of Health.

4.0 REVEGETATION OF THE PRATT PROPERTY

4.1 Introduction

The following are recommendations for the revegetation program of the Pratt property site. Industrial Compliance Inc. contacted the Soil Conservation Services (SCS) of Longmont for recommendations for restoring the area to a condition that is as close as possible to its original vegetative cover. A copy of Standards and Specifications, Critical Area Planting, and Mulching provided by the SCS is included as Attachment B.

The program calls for laying down a topsoil layer, fertilizing according to the soil analysis, seeding with native grasses, and mulching with a high grade hay. Some of the recommendations concerning the amount of fertilizer used may change depending on the results of the soil test.

4.2 Topsoil

The topsoil scheduled to be used in the area will be taken from a soil borrow area southeast of the Pratt property. The top soil is currently supporting vegetation and will sustain the grasses to be used in the revegetation plan. Topsoil building will not be necessary due to a sufficient amount of organic material already present.

Approximately 8 - 12 inches of topsoil will be scraped from a soil borrow area and stored in stock piles until revegetation activities begin. The final layer of topsoil will be a minimum of 6 inches thick. It is important to assure that the seed will have a firm bed and will minimize wind erosion. This can be accommodated by rolling or harrowing the topsoil prior to seed planting.

4.3 Fertilizer

The SCS suggested a minimum 40 pounds of available nitrogen and 40 pounds of phosphorous (as phosphate) be applied per acre. A soil sample taken of the topsoil from the borrow area was submitted for analysis. A review of these results will allow for a better determination of the application rate of fertilizer for the site specific topsoil. Fertilizing will be done immediately prior to seeding to reduce the possibility of dispersion by wind and rain.

4.4 Seeding

The types of native grasses chosen for revegetation in this area are Luna Pubescent Wheat and Arriba Western Wheatgrass. The blend of 80 and 20 percent respectively is recommended. Luna Pubescent Wheat establishes itself quicker to stabilize the soil. Arriba Western Wheatgrass takes longer to establish but is a hardier variety that is more tolerant of adverse conditions such as drought.

Seed placement will be accommodated by drill seeding to a depth of 1/4 - 3/4 of an inch. This method uses less seed than broadcast seeding and insures the seed will be at a proper depth for germination. Approximately 7.2 pounds of Luna Pubescent Wheat and 1.6 pounds of Arriba Western Wheatgrass seed will be used per acre. Pure live seed (PLS) should be used to insure the no weeds or inert material such as seed hulls or weeds are included in the seed blend.

4.5 Mulching

Using mulch provides protection for the seed by conserving moisture, reducing runoff, and protection from foraging birds and insects. The mulch should be crimped or bent to keep it in place. A high quality hay should be used as mulch. This will provide a good seed later and lower the possibility of introducing weeds that may gain an advantage in the seeded area. An application rate of 4000 pounds per acre is recommended.

4.6 Conclusions

Following the above recommendations will restore Pratt property to a range land compatible with the natural surrounding vegetation. Erosion by wind and precipitation will be reduced thereby preserving the landfill cap.

5.0 SUBSIDENCE AND CONSOLIDATION MONITORING OF THE PRATT PROPERTY

5.1 Introduction

The current Western Landfill is undermined by the Columbine Mine, one of the largest mines in the Boulder/Weld coal field. The shafts of the Columbine Mine are approximately 300 to 400 feet beneath the surface, creating the potential for subsidence over much of the Western Landfill including the Pratt Property. In addition to the mines underlying the site, there is the likelihood of consolidation of the refuse causing settling of the Pratt Property.

Standard 19 and Standard 14 of the Use By Special Review (USR) permit issued by Weld County, specify that subsidence monitoring will be completed semi-annually on the southern portion of the Pratt Property as well as on the combined site for a period of five years after closure. The results of each monitoring effort will be documented to verify the condition of the site, and will be submitted to the Weld County and Colorado State Health Departments for review.

Industrial Compliance Inc. has been retained by Laidlaw to prepare this subsidence and consolidation monitoring plan for the Pratt Property. Settlement of refuse and subsidence at a landfill will result in depressions in the final cover that will pond water. This ponded water has the potential to infiltrate and create excessive leachate. Any settlement should be filled to promote positive runoff.

5.2 Monument Locations and Construction

Monuments used for monitoring subsidence and consolidation will be constructed at five locations on the Pratt Property. The monument locations are selected to comply with the USR requirements and are as follows:

Monument 1 - Control point in the northeastern corner of the Pratt Property.

Monument 2 - Subsidence monitoring point along the southern fenceline of the Pratt Property.

Monument 3 - Consolidation monitoring point located on the eastern third of the landfill where refuse was buried in the gully.

Monument 4 - Consolidation monitoring point located on

the western third of the landfill where refuse was buried in the gully.

Monument 5 - Consolidation monitoring point located on the southern border on top of the filled area.

The monuments will be set in the ground approximately 18 inches and will be constructed of steel reinforced concrete. Each monument will be permanently numbered.

5.3 Monitoring Program

The monuments will be constructed and the initial elevations and locations will be surveyed and documented by a registered Professional Land Surveyor (PLS). The elevations of the monuments will subsequently be surveyed on a semi-yearly basis for a period of 5 years. The surveying will be completed and certified by a registered PLS. The results of each monitoring effort will be recorded, interpreted, and forwarded to Laidlaw in letter form incorporating any necessary recommendations. The monitoring results will also be forwarded to Weld County and to the Colorado Department of Health either by Laidlaw or their independent contractor.

The results will be interpreted to conclude whether there is a possibility for water ponding on the landfill surface. If there is, actions will be taken to place soil in these areas and bring the landfill back to final grades to ensure runoff to the perimeter drainages. The refilled areas will then be reclaimed according to the Pratt Property revegetation plan. The monument will be covered over and will therefore, need to be replaced. The replacement monument will be located atop the newly filled area adjacent to the previous monument. It will be constructed in the same manner as the initial monuments and will be surveyed in by a registered PLS and continue to be monitored on a semi-yearly basis.

6.0 Post Closure

6.1 Post Closure Monitoring

The nine groundwater monitoring wells will be sampled or checked quarterly during the post closure period of five years. Analyses will be identical to those conducted during the life of the facility.

If monitoring results for a given sampling vary significantly from previous samplings, additional samples will be collected and analyzed. If the additional results confirm a significant and adverse change in conditions, the state and county will be notified of the results within five working days. The operator will request a meeting with Weld County and the Colorado State Department of Health to discuss the monitoring results. If necessary, confirmation sampling and testing will be conducted. If an environmental problem is confirmed, the operator will have an additional 30 days to evaluate the data and present a plan of action to both the county and the state. The plan will include specific actions and a time schedule required to correct the situation. On approval, the plan will be implemented.

6.2 Post Closure Inspections

Inspections of the Pratt Property will be conducted throughout the 5 year post closure period. The inspections will include documentation of surface cracking, erosion, slope angles, drainage, and condition of vegetation. Subsidence monitoring, as outlined in section 5.1 of this report, will also be conducted during the 5 year post closure period.

6.3 Post Closure Land Use

Future land use and development of the Pratt Property will be determined by Laidlaw upon closure of the site. Use of the property for farming or livestock grazing is the most likely end land use at this time.

Respectfully Submitted:

INDUSTRIAL COMPLIANCE INC.

Curtis J. Ahrendsen
Environmental Engineer

Reviewed By:

Michael H. Stewart, P.E.
Senior Engineer

ATTACHMENT A

GROUND-WATER MONITORING PROGRAM

Ground-Water Monitoring Plan
For The Laidlaw South Landfill

By:

Industrial Compliance Incorporated
511 Orchard Street
Golden Colorado 80401
(303) 277-1400

Project Number: 1-1803
March 28, 1988

Monitoring Procedure

Premonitoring Activities

Table 2 contains all the information on what you must do prior to beginning monitoring. The two main activities are to order sample bottles from a laboratory and to check to ensure that you have all of the necessary equipment. If you desire, ICI can order the bottles and have them sent to you. The equipment should be checked to make sure that it is all there and functioning correctly the day before monitoring.

Procedures for Monitoring Holes

The following items should be completed and noted on the field data sheet for each well that is dry (no free-standing water in well)

- The depth of the well. A weighted tape should be dropped to the bottom of each well, the total depth measured, and recorded.

- The condition of the well. Should be noted as okay or specific problems outlined.

- General comments. Information on when repairs were completed, if the probe was dry after measurement of the well depth, etc.

Table 2 - Premonitoring Checklist

Analysis: EPA Method 624 for Volatile Organics

- Give name of project: Brunswick
- Repeat above method.
- Tell them that you need a cooler.

Check Equipment

_____ Calculator
_____ Paper Towels
_____ Water level indicator
_____ 5-gallon bucket
_____ Copy of Field Data Sheet (original attached to this document)
_____ 4 gallons of distilled water
_____ pH meter with calibration solutions (calibrate morning of sampling)
_____ Thermometer
_____ Laundry basket
_____ Ice (on day of sampling)
_____ Bailer

There are really only two types of wet wells that you must sample: those that can be bailed dry and those that produce enough water to sustain continuous bailing. The procedures for bailing each well are discussed below.

Sampling a Well That Can Be Bailed Dry

The following procedures should be followed for this type of well:

1) Inspect the well. Note any problems that must be corrected in the comments portion of the Field Data Sheet.

2) Remove the cap. Remove the bailing rope that is suspended in the well and place it in the laundry basket (make sure that the basket is clean and rinsed with distilled water).

3) Measure the depth to water using a tape with a "plopper" on the end. (Make sure plopper is cleaned and rinsed with distilled water prior to inserting in the well). Write this depth on the Field Data Sheet.

4) Calculate the volume of water in the well and write it on the Field Data Sheet. (Instructions to do this are on the sheet).

5) Securely attach the rope to the bailer. Remove the water and place it in the 5-gallon bucket. Continue to bail the well until it is "dry" (with 6-inches of the bottom is typically as close as you can get). You can empty the bucket on the ground when it is full, but keep track of the total volume of water removed. When the well is bailed "dry" write total volume of water removed in the Volume Removed column of the Field Data Sheet. DO NOT LET BAILER TOUCH GROUND. PLACE ALL ROPE IN BASKET SO THAT IT DOES NOT GET DIRTY.

6) Clean bailer and laundry basket with distilled water.

7) Go perform other activities so that the well can recover and enough water will be present to fill all sample bottles.

8) Return to well, label and fill sample bottles according to instructions in Section 3.

9) Remove rope from bailer and replace in well. Thoroughly clean and rinse all equipment with distilled water.

Sampling A Wet Well That Cannot Be Bailed Dry

1) Inspect the well. Note any problems that must be corrected in the Comments portion of the Field Data Sheet.

2) Remove the cap. Remove the bailing rope that is suspended in the well and place it in the laundry basket (make sure that the basket is clean and rinsed with distilled water).

3) Measure the depth to water using a tape with a "plopper" on the end. (Make sure plopper is cleaned and rinsed with distilled water prior to inserting in the well). Write this depth on the Field Sheet.

4) Calculate the volume of water and write it on the Field Data Sheet. (Instructions to do this are on the sheet).

5) Securely attach the rope to the bailer. Bail the well and place the water in the 5-gallon bucket. Continue to bail the well until you have removed a volume of water that is 3 times the calculated well volume (i.e. if the well contains 2 gallons of water, bail it until you have removed 6 gallons). You can empty the bucket on the ground, but keep track of the volume. DO NOT LET THE BAILER OR ROPE TOUCH THE GROUND. MAKE SURE THAT YOU HOLD ALL OF THE ROPE OR PLACE IT IN THE BASKET. Write the total volume of water removed in the Volume Removed column on the Field Data Sheet.

6) Label and fill sample bottles according to directions in Section 3.

7) Remove rope from bailer and replace in well. Thoroughly clean and rinse all equipment with distilled water.

Labeling and Filling Sample Bottles

Two bottles will have to be filled at each well. This section describes how to label and fill them.

Labeling Bottles

The bottles should be labeled with an indelible marker (SANFORD Sharpie markers work very well). The following information should be included:

Well Name (on both label and bottle)
Sampling Date and Time
Sampler's Initials
Type of Sample (Ground Water, Unfiltered)
Location (Main Plant MW-5 etc...)

An example is included as Figure 2. The bottles should be labeled prior to filling. It is much harder to mark on a wet label or bottle.

Filling Bottles

The bottles should be filled directly from the bailer. Try to pour the water down the side of each bottle (like filling a beer glass) to minimize splashing and the introduction of air bubbles in the water. Be careful not to let any dirt fall into the sample bottle by placing all lids in a clean place.

Immediately place each bottle in an ice-filled cooler after you have filled it. Deliver the samples to the laboratory as soon as possible after you have finished sampling.

FIGURE TWO - SAMPLE BOTTLE LABEL

Industrial
Compliance
Incorporated

3-30-88
AT 10:30

511 Orchard Street
Golden, Colorado 80401

LAIDLAW
WELL GW-8, UNFILTERED GROUNDWATER
RC

Helpful Hints

1) Use plenty of distilled water in the washing and rinsing process. One gallon on distilled water costs around $1.00. Each sample costs $235.00 to analyze, plus the labor costs to develop the well and collect the sample. Distilled water is cheap insurance against cross contamination. When in doubt, rinse a piece of equipment (tape, rope, bailer, etc.).

2) Never let a clean bailer or the rope touch the ground. Always place them in the sample basket.

3) Use Playtex type rubber gloves to keep your hands warm in the winter.

4) Always wear safety glasses when bailing to prevent splash from getting into your eyes.

5) Place the sample results in the three-ring binder behind this document. Store this binder in a place where it can be easily retrieved and shown to regulatory personnel when they make site visits.

LAIDLAW SOUTH LANDFILL

Ground Water Monitoring Data Sheet

Sampler Name:_____ Date:_____

Well No.:_____ Well Condition:_____

Pipe Stickup_____ Depth of Well (from ground level)_____

Depth of Water (from ground level)_____ Volume of Water*_____

Volume of Water Removed*_____Gallons

Comments:_____
_____
_____
_____

Weather:_____

****

Sampler Name:_____ Date:_____

Well No:_____ Well Condition:_____

Pipe Stickup_____ Depth of Well (from ground level)_____

Depth of Water (from ground level)_____ Volume of Water*_____

Volume of Water Removed*_____Gallons

Comments:_____
_____
_____
_____

Weather:_____

* NOTE: TO CALCULATE VOLUME OF WATER IN WELL
-Subtract the depth to water from total well depth
-Multiply this value by 0.163 to get volume in gallons
-Example: 30'-12.8'=17.2', so 17.2 x0.163 =2.80 gallons

TO CALCULATE VOLUME OF WATER REMOVED
-Each full bailer = 0.29 gallons or 3.5 bails = 1 gallon
-Or just empty into a 5-gallon bucket

ATTACHMENT B

SOIL CONSERVATION SERVICE SPECIFICATIONS

UNITED STATES DEPARTMENT OF AGRICULTURE
Soil Conservation Service
Colorado

Technical Guide
Section IV
All Field Offices
July 1985

STANDARD AND SPECIFICATION
PASTURE AND HAYLAND PLANTING (Acre) 512

STANDARD

Definition

Establishing and re-establishing long-term stands of adapted species of perennial, biennial, or reseeding forage plants. (Includes Pastures and Hayland Renovation. Does not include Grassed Waterway or Outlet on cropland.)

Purpose

To reduce erosion, to produce high quality forage, and to adjust land use.

Conditions Where Practice Applies

On existing pasture and hayland or on land that is converted from other uses.

SPECIFICATIONS

1. Seedbed Preparation

   Irrigated Sites

   A. Seedbed should be smooth and firm. It should be relatively free of weeds and other plants that may interfere with stand establishment and crop production.

   B. Seeding may be on bare ground, weed-free stubble, or chemically treated sod. Seeding into stubble or chemically treated sod is an ideal seedbed and is especially well adapted for slopes where erosion from irrigation may be a problem.

   C. Companion crops may be recommended if needed to control erosion until pasture and hayland planting is established. (However, discretion must be exercised in recommending a companion crop. Seeding rates are often too high and crop management favors harvest of the companion crop, rather than stand establishment of the pasture and hayland planting.)

d. Annual weed cover is the least desirable method of preparation.

Seedbeds having an annual weed cover are satisfactory if the seedbed is firm and if the stand of weeds is not dominated by tumbling Russian thistle, sandbur, cockelbur, fetid marigold, Canada horseweed, kochia or by other seriously competitive weed species. Steps must be taken to control weeds to protect the new seeding should weeds make rank growth following the seeding. Where competitive weeds exist the labeled application of a non-selective broad spectrum contact herbicide, (e.g. Roundup) 1/, could be used in lieu of plowing to prepare a satisfactory seedbed.

2. Seeding

Seeding should be done with equipment capable of proper seed placement and accurately metered for the proper rate for the selected species.

3. Fertilizer Application

Most plantings should be fertilized at time of seeding and on an annual basis as needed. Recommendations should be based on results of soil test. If these are not available, a minimum of 100# of a 20-10-4 or similar fertilizer should be applied.

4. Selection of Species

A. Select adapted species for the given Land Resource Area based on adaptation to site, intended use of planting and on adequacy for erosion control. Species and varieties may be added with approval of the State Agronomist.

B. Irrigated - If a species is designated as being adapted to irrigated sites in a given Land Resource Area, the species is usually adapted to the entire area where irrigation is used.

C. Non-Irrigated - Item 4B above is usually not applicable when species are recommended for non-irrigated sites in a given Land Resource Area. Species adaptation on non-irrigated sites is much more critical. See Standard and Specifications for "Critical Area Plantings," Range Seeding, or other references if specific information is needed for species on non-irrigated sites. Table 2 lists additional legumes and forbs for non-irrigated pasture and haylands.

D. Pure stands of grass(es) or legume(s) or mixtures of grass(es) and legume(s) qualify for pasture and hayland plantings. (See item 4E below.)

1/ Use of trade name is for clarity only and does not imply endorsement of any one product over others labeled for the same treatment.

7. Management (for establishment)

A. Harvest or grazing during initial establishment season will be limited to the same requirements found in the Standards and Specifications for Pasture and Hayland Management (Code 510).

B. Control weeds and seed production from volunteer small grain and cover crops. Mowing at a height of 6 to 8 inches at the appropriate time is usually a very effective control. Herbicides are recommended for weed control in grass seedings. (See Colorado Weed Control Handbook for information on herbicides.)

EXHIBIT
19

Form GO-11

CONTINUOUS CONTINUOUS

AUTHORITY

ISSUED BY

THE PUBLIC UTILITIES COMMISSION

of the

STATE OF COLORADO

506 STATE SERVICES BUILDING
1525 SHERMAN STREET
DENVER 3, COLORADO

July 9, 1965

To John F. & Ima J. Neuhauser
1862 Stillwater Way, Rt 1.
Lafayette, Colo. 80026

Certificate or
Permit Number
5623

As follows: Transportation of ashes, trash, and other waste materials, between points within the towns of Louisville and Lafayette, Colorado, and from said towns to regularly-designated and approved dumps and disposal places in Boulder County, Colorado.

Seal

(NOT VALID UNLESS UNDER SEAL OF COMMISSION)

A COPY OF THIS AUTHORITY MUST BE CARRIED IN THE CAB OF EACH AND EVERY VEHICLE OPERATED UNDER THE ABOVE NUMBER AND TO BE USED FOR THAT PURPOSE ONLY

PUC 2.30

LETTER OF AUTHORITY

CONTINUOUS
Until Revoked - Cancelled
Suspended - Altered or Amended

CONTINUOUS
Until Revoked - Cancelled
Suspended - Altered or Amended

Issued By

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

August 18, 1967

BOL 003 BOL 003

CERTIFICATE NUMBER _____

PERMIT NUMBER B-7080

TO: Boulder Disposal
1862 Stillwater Way
Lafayette, Colo. 80026

Dec. #69689: Transportation of ashes, trash and other waste material for one customer only, viz., I.B.M. Plant, located at 6300 Diagonal Highway, Boulder, Colorado, to and from designated and approved dumps and disposal sites within a 20 mile radius of said plant.

(SEAL)

rs

(NOT VALID UNLESS UNDER SEAL OF COMMISSION)

THIS LETTER OF AUTHORITY MUST BE CARRIED IN THE CAB OF EACH AND EVERY VEHICLE OPERATED UNDER THE ABOVE AUTHORITY NUMBER.

ABOVE AUTHORITY NUMBER AND ABOVE CARRIER'S NAME AND ADDRESS MUST BE PAINTED ON B
SIDES OF ALL MOTOR VEHICLES, TRAILERS AND OTHER VEHICLES USED UNDER THE ABOVE AUTHORI

PUC 2.30

CONTINUOUS
Until Revoked - Cancelled
Suspended - Altered or Amended

LETTER OF AUTHORITY

CONTINUOUS
Until Revoked - Cancelled
Suspended - Altered or Amended

Issued By

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

June 23, 1967

CERTIFICATE NUMBER 3964

PERMIT NUMBER _____

TO: Boulder Disposal Service
1862 Stillwater Way
Lafayette, Colorado 80026

Dec. # 69622: Transportation of ashes, trash, and other waste materials, between points within the City of Boulder, Colorado, and a five-mile radius thereof, and from said area, to regularly-designated and approved dumps and disposal places in Boulder County, State of Colorado.

bb

(SEAL)

(NOT VALID UNLESS UNDER SEAL OF COMMISSION.)

THIS LETTER OF AUTHORITY MUST BE CARRIED IN THE CAB OF EACH AND EVERY VEHICLE OPERATED UNDER THE ABOVE AUTHORITY NUMBER.

ABOVE AUTHORITY NUMBER AND ABOVE CARRIER'S NAME AND ADDRESS MUST BE PAINTED ON BOTH SIDES OF ALL MOTOR VEHICLES, TRAILERS AND OTHER VEHICLES USED UNDER THE ABOVE AUTHORITY.

EXHIBIT 4

IBM

Date: July 7, 1966
From (Dept/Loc): 702 - 910 SMD Boulder
Telephone Ext.: 7548

Subject: Industrial Waste Treatment System

Reference:

To: J.J. Jefferson

COPY

Plant Engineering Department condensed and compiled into a format previous surveys and reports concerning industrial wastes expected to be generated at IBM-Boulder.

The current problems differ from the picture presented late last year, primarily, in quantity terms. Early predictions of industrial waste quantity have been scaled down in recent months.

RECD is expected to review with the Architect and his consultant Boulder plant industrial waste situation and recommend disposal techniques and/or treatment facilities.

Culminating all of this review and design, RECD will be expected to install the requirements as recommended and approved.

RECD REPORT BY AUGUST 1, 1966

E.W. Higgins, Manager
Facilities Engineering and Maintenance

EWH:DMW:fms
cc: O.J. Davenport
T.J. Liguore
J.S. McDonald
F.T. Williams

INDUSTRIAL WASTE DISPOSAL

INTRODUCTION

This report has been compiled to provide RECD with the latest information available to Plant Engineering Department concerning industrial waste at the IBM-Boulder Site. Mr. E.W. Higgins referenced the development of this report in his correspondence dated June 20, 1966 and July 5, 1966 to Mr. J.J. Jefferson.

Careful consideration of the industrial waste disposal system proposed by Chester Engineering firm and re-evaluation of the quantities and types of industrial waste involved necessitates the reconsideration of previously propounded methods of disposal and the possibility of an entirely different method of disposal.

SCOPE

The industrial waste discussed in this report shall be confined to liquids and sludge/solids derived from manufacturing processes and laboratory experiments at Building 002, 003, 016 and 021 of the IBM-Boulder operation. Since gaseous waste and solvent vapors were previously discoursed with RECD they will not be discussed further in the report. Industrial wastes of a trash nature (e.g. cardboard, oily rags, glass) are presently being collected and disposed of by Maintenance personnel and need not be considered.

A method of industrial waste disposal must be flexible and adaptable to large fluctuation in quantity and types of waste to be disposed of; facility growth and production expansions must also be provided for.

SERVICES AVAILABLE

The Purchasing Department located the Denver Clean-Up Service, a scavenger, willing and equipped to take all industrial waste generated by IBM-Boulder and dispose of, or transport it, to a reclaimer of IBM choice. The Purchasing Department is confident a contract can be signed that will protect IBM against any responsibility once the industrial waste is in the scavenger's possession. This scavenger is able to provide 10,000 gallon tank truck, several 4,000 gallon tanks on a truck bed, or a tractor trailer with 26' bed for precartoned container loads.

The Maintenance Department will provide in plant transportation services for industrial waste as required during disposal. Special conveyance equipment required by Maintenance to transport industrial waste will be a part of the RECD recommendations and systems. Maintenance personnel will not be qualified to mix or combine industrial waste.

FACILITIES AVAILABLE

Although a partial system of acid and solvent collection is installed in the Engineering Building 021, and a system for acid collection and neutralization is included in Systems Manufacturing Building 002, recommendations will be necessary from RECD for components and procedures to complete the systems. No special systems are at present installed in Systems Manufacturing Building 003 or Information Records Building 016.

REQUIREMENTS

It is anticipated that RECD will provide a system of industrial waste disposal consistent with present and future needs of the IBM-Boulder installation, while retaining the flexibility necessary to process the wide variety of industrial wastes involved.

ATTACHMENTS

A concise list of industrial waste materials expected to be generated at the IBM-Boulder Site is produced in Appendix A.

APPENDIX A

Building 016 - IRD

Chemical	Disposal Quantities Average
2/3 Methyl Ethyl Ketone 1/3 Toluene and Cyclohexanone	150 gal/day [1]
50% Isopropanol	25 gal/day
Laboratory Chemicals	Beaker Size

1. Possibility of reduction to 50 gal/day of "non-flammable" semi-solids, see Reference No. 4.

Building 021 - Engineering

Chemicals	Disposal Quantities Average
Polymers [1]	10 lbs/wk
Acids [1]	Beaker Size
Solvents [1]	Beaker Size
Other [1]	Beaker Size

1. See Table II, pp. 11-14, Reference No. 1 for detail chemical list

Building 002 - Systems Manufacturing Division

Chemical	Disposal Quantities Average
Salts [1]	1 lb/day
Acids [1]	Beaker Size
Freon Solutions [1]	Beaker Size
Other laboratory mixtures [1]	Beaker Size

1. See Table III, pp. 24-26, Reference No. 1 for detail chemical list

BUILDING 003 - SYSTEMS MANUFACTURING DIVISION

Chemical	Disposal Quantities Average
Oil Solutions [1]	20 gal/day
Cyanide Solutions [1]	2 gal/day

1. See Table II 1 for detail chemical list

July 7, 1966

REFERENCE MATERIAL

1. Report on Disposal of Industrial Waste Report, The Chester Engineers, March 25, 1966.

2. Dilution of Industrial Wastes in Sanitary Sewers, Letter to Mr. J.J. Jefferson from The Chester Engineers, May 18, 1966.

3. Industrial Waste Treatment, Letter to Mr. J.J. Jefferson from Smith, Hinchman & Grylls Associates, Inc., June 23, 1966, with sketches.

4. IRD Industrial Waste, Letter to Mr. E.W. Higgins from Mr. W.A. Barker, June 23, 1966.

COPY

EXHIBIT
18

September 29, 1966

Mr. John F. Neuhauser
Sanitation Engineering Corporation
1862 Stillwater Way
Lafayette, Colorado

Mr. Glen E. Paul
Weld County Health Department
P.O. Box 1227
Greeley, Colorado 80631

Dear Mr. Paul:

Per our conversation today, September 29, 1966, the following standards will be adhered to by Sanitation Engineering Corporation, 1862 Stillwater Way, Lafayette, Colorado, with your approval.

1. Dump area will be fenced.
2. Dump will be packed and covered daily.
3. Dump will be kept free and clear of litter and blowing debris by picking the ground at least once per week.
4. Drainage will be maintained so as not to cause contamination of ground water.
5. There will be no burning of household refuse allowed.
6. Dump hours shall be 7:00 AM to 6:00 PM, Monday through Saturday, from August 31 to October 31, 1966. From November 1, to March 31, hours will be 7:30 AM to 5:00 PM, Monday through Saturday. On Sundays, dump will be open from 9:30 AM to 3:30 PM. Dump will be closed Thanksgiving, Christmas, and New Year's.
7. Drinking water and necessary sanitary facilities will be available for employees.
8. Adequate equipment will be maintained for compliance of the above standards.
9. Any other standards deemed necessary by Weld County or the State of Colorado will be adhered to.

Weld County approval for use of this land as a sanitary landfill is respectfully requested by Sanitation Engineering Corporation. Your concurrence with this request at your earliest convenience will be greatly appreciated.

The above proposal approved by the Weld County Health Department this 3rd day of October, 1966.

By direction of J. H. White, M.D.,
Director

Glen E. Paul

Glen E. Paul, Chief Sanitarian
Weld County Health Department

EXHIBIT

6

IBM
OFFICE OF COUNSEL
OCT 10 3 02 PM '66
BOULDER, COLORADO

IBM

Date: October 7, 1966
From (Dept/Loc): 354/002 SMD Boulder
Telephone Ext.: 4313

COPY

Subject: Solvent Waste Removal

Reference:

To: Mr. Ed Higgins
Department 702
Building 001

Arrangements and contractual coverage has been made with Denver Clean-Up Service of Denver to pick up and remove solvent waste from the IBM, Niwot facility.

Waste will be removed on a call basis, with a minimum load of ten 55 gallon barrels per call, at a cost of $3.00 per barrel.

Mr. Herb Horn, has agreed to coordinate the solvent waste collection. The coordination effort will 1. preclude telephone calls from people in several areas who have sperodic waste removal requirements, 2. provide an indication of the type of solvents to be removed and 3. provide a basis for projecting the total quantity of waste solvent we may generate.

This interim measure solves the problem of current waste removal, however, sufficient information is still not available to approach any potential vendor for ultimate volume solvent removal negotiations.

K.N. Colton, Buyer
Purchasing Department

/pl

cc: Ed Newquist
R.L. Cross
R. Rogers
H. Horn

EXHIBIT
20

COPY

(Decision No. 69113)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

* * *

IN THE MATTER OF THE APPLICATION OF JOHN F. NEUHAUSER AND IMA J. NEUHAUSER, DOING BUSINESS AS "J & I DISPOSAL," 1862 STILLWATER WAY, ROUTE 1, LAFAYETTE, COLORADO, FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING EXTENSION OF OPERATIONS UNDER PUC NO. 5623.	APPLICATION NO. 22240-Extension
IN THE MATTER OF THE APPLICATION OF JOHN F. NEUHAUSER AND IMA J. NEUHAUSER, DOING BUSINESS AS "TOWN & COUNTRY DISPOSAL," 1862 STILL-WATER WAY, ROUTE 1, LAFAYETTE, COLORADO, FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING EXTENSION OF OPERATIONS UNDER PUC NO. 4766.	APPLICATION NO. 22241-Extension

March 6, 1967

Appearances: McLean and McLean and William Andrew Wilson, Esqs., Denver, Colorado, for Applicants;
Peter C. Dietze, Esq., Boulder, Colorado, for City of Boulder, Protestant.

STATEMENT AND FINDINGS OF FACT

Application No. 22240-Extension being the application of John F. Neuhauser and Ima J. Neuhauser, doing business as "J & I Disposal," and Application No. 22241-Extension, being the application of John F. Neuhauser and Ima J. Neuhauser, doing business as "Town and Country Disposal," of which the Commission takes official notice, were called up for hearing and attorney for Applicants moved to amend their applications to provide as follows, to-wit:

> "that this extension be granted to include to and from any duly designated or approved dump sites within a thirty mile radius outside the city limits of the City of Boulder, approved by any town, municipality, city, county or state agency having the authority so to do."

Highway No. 7 to Colorado Highway No. 1 (U.S. 287); thence North on Colorado Highway No. 1 (U.S. 287) to Boulder County Road No. 42 (Erie-Canfield Road); thence West on Boulder County Road No. 42 extended to the five-mile radius of the City of Boulder, thence South on the City of Boulder five-mile radius to Boulder County Road No. 60 (South Boulder Road); thence East on Boulder County Road No. 60 (South Boulder Road) to Colorado Highway No. 42 and the point of beginning, to and from any duly designated or approved dump sites within a thirty (30) mile radius outside the City Limits of the City of Boulder, approved by any town, municipality, city, county, or state agency having the authority so to do.

That John F. Neuhauser and Ima J. Neuhauser, doing business as "Town & Country Disposal," Lafayette, Colorado, be, and hereby are, authorized to extend operations under PUC No. 4766, and that henceforth the full and complete authority under said PUC No. 4766 shall authorize the following, to-wit:

(Transportation of rubbish and trash within the City Limits of Lafayette, Colorado and Louisville, Colorado, and within that area adjacent to said cities, described as follows:
Commencing at the intersection of Colorado Highway No. 7, and Colorado Highway No. 1 (U.S. Highway No. 287); thence north on said Highway No. 1 to County Road No. 42 (Erie-Canfield Road); thence east on County Road No. 42 to County Road No. 109; thence south on County Road No. 109 to Colorado Highway No. 7; thence east on Highway No. 7 to the Boulder-Adams County Line; thence south on the Boulder-Adams County Line to Colorado Highway No. 170; thence west on Highway No. 170 to five-mile radius of the City of Boulder; thence north on the Boulder five-mile radius to Boulder County Road No. 60 (South Boulder Road); thence east on Road No. 60 to Colorado Highway No. 42; thence north on Highway No. 42 to Colorado Highway No. 7; thence east on Highway 7 to Colorado Highway No. 1 and the point of beginning; and also including that area within the Town of Erie, Weld County, Colorado, to and from any duly designated or approved dump sites within a thirty-mile (30) radius outside the City Limits of the City of Boulder, approved by any town, municipality, city, county or state agency having authority so to do.)

This Order shall become effective twenty-one days from date.

(S E A L)

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

HENRY E. ZARLENGO

HOWARD S. BJELLAND

EDWIN R. LUNDBORG

Commissioners

Dated at Denver, Colorado,
this 6th day of March, 1967.
gh

ATTEST: A TRUE COPY

Edwin R. Lundborg, Acting Secretary

XEROX W.B.

EXHIBIT 5

IBM

Date: May 5, 1967
From (Dept/Loc): 703 - 001 SMD Boulder
Phone Ext.: 4615

Subject: AME Lab Ferric Chloride Waste Disposal

Reference: W. Bocim's Letter to R. Kaper Dated 3/30/67, Paragraph Referring to the Letting of Ferric Chloride to the Sanitary Sewer

To: File

COPY

Facilities Engineering has been informed by W. Bocim of the Safety Department that the AME Lab will not dump ferric chloride into the sanitary sewer. The waste will be collected in containers and transported to the waste treatment area where it will be scavengered along with other plant waste by a vendor disposal service.

D.E. Clemenson

DEC:fms
cc: R.G. Kaper
A.H. Kendall
T.J. Liguore
D.M. Webster
F.T. Williams ✓

EXHIBIT
7

Date: July 12, 1967
From (Dept/Loc): D/354
Telephone Ext.: 4313

IBM
OFFICE OF COUNSEL
JUL 13 11 AM '67
BOULDER, COLORADO

IBM

Subject: Chemical Removal

Reference:

COPY

To: R. L. Cross

In response to our request to Denver Clean-Up Service to provide the subject service to IBM Boulder, I am attaching a copy of their response.

Your attention is directed to the last two sentences of the 3rd paragraph which we may decide to act upon.

We will periodically follow the progress of these hearings with Denver Clean-Up Service to provide us with sufficient time to make any internal arragnements necessary for solvent storage and/or removal should an adverse decision be handed down by the P.U.C.

If you have any further information on these hearings through your office, I would appreciate hearing of them.

K. N. Colton, Buyer
Purchasing Department

/vh

cc: E. W. Newquist
T. E. Smail

DENVER CLEAN-UP SERVICE
INDUSTRIAL, COMMERCIAL, RESIDENTIAL, TRASH SERVICE
755-1105 777-5402
803 SO. JASON DENVER 19, COLO.

July 11, 1967

Mr. T. E. Smail, Asst. Buyer
Purchasing Department
IBM Corporation
P. O. Box 1900
Boulder, Colorado 80302

Dear Mr. Smail:

In answer to your request of June 26, 1967 for our P.U.C. status to haul chemicals from your plant in Boulder County, I can relate to you the following information. We will be allowed a temporary permit until a decision is reached following a rehearing on August 30 and 31, 1967.

In October of 1966 we had a P.U.C. hearing and were opposed by our competitors at which time we proved they had no valid claim to prevent us from expanding into several additional counties of Colorado. The 28th of February, 1967 an order was passed down giving us the authority for which we applied. On March 22nd the Commission granted the Protestants a rehearing and we have been since then setting a date. There has been and still is some "hanky-panky" but our case is getting stronger by the day.

We are very optomistic at this point and feel sure that we will win our case. If the P.U.C. turns down our application again, we will go to the District Court and then the Supreme Court if necessary. The most encouraging aspect of the next hearing is a new law passed during the last session that changes the statutes to regulated competition rather than regulated monopoly. We still need IBM to send a representative to testify at this hearing to help insure our success. Several other industries who need our type service will also testify. We are trying to fill a need in an area of neglect.

I hope this will answer your question. If you need further information, please call.

Yours truly,

Don L. Hentschel

DLH:ew

EXHIBIT
8

July 12, 1967
D/354
4313

OFFICE OF COUNSEL
JUL 13 11 18 AM '67
BOULDER, COLORADO

Chemical Removal

W. T. Bocium
F. C. Nelson
D. M. Webster

COPY

I have been advised by Denver Clean-Up Service that their temporary permit for hauling chemical for IBM Boulder is valid through August 31, 1967. Continuance of the permit will be determined as a result of a re-hearing on August 30th and 31st.

I will keep you posted on the developments as they occure to allow you sifficient time to make the necessary arrangements should an adverse decision be handed down by the P. U. C.

K N Colton
K. N. Colton, Buyer
Purchasing Department

/vh

cc: R. L. Cross
O. J. Davenport

BOL 003 007

EXHIBIT 11

Date: August 29, 1967
From (Dept/Loc): 702 - 001-3 SMD Boulder
Telephone Ext.: 4545

IBM CONFIDENTIAL

IBM

Subject: Trash Hauling

Reference:

COPY

To: File

Mr. Herb Horn received a telephone call from Mr. John Newhauser, owner of Sanitation Engineering Corporation from Lafayette. This company provides trash hauling service for the IBM-Boulder plant site. Mr. Newhauser appeared to be quite upset and indicated that he had received a call from a Mr. Bill Wilson, who represented himself as the attorney for the local Trash Haulers' Association. Mr. Wilson indicated that Mr. R. V. Rogers and the writer would testify tomorrow at a P.U.C. Hearing that we found Mr. Newhauser's service inadequate.

E. W. Higgins

EWH:sa

cc: R. L. Cross
T. J. Liguore

Not true & Newhauser so advised

8-30-67

I saw N. at the hearing & he pointed to Counsel's table (i.e. opposition to Applicant Denver Clean Up) indicating that one of the two attys there was Mr. Wilson. N. understood that IBM was subpoenaed & did not appear in behalf of applicant.

RLC

EXHIBIT

9

COPY

(Decision No. 70975)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

* * *

IN THE MATTER OF THE APPLICATION OF)
DENVER CLEAN-UP SERVICE, INC., 803)
SOUTH JASON, DENVER, COLORADO, FOR)
A CERTIFICATE OF PUBLIC CONVENIENCE) APPLICATION NO. 22155-Extension
AND NECESSITY AUTHORIZING EXTENSION)
OF OPERATIONS UNDER PUC NO. 3343.)

March 5, 1968

Appearances: James C. Perrill, Esq., Denver, Colorado, for Applicant;
Leslie R. Kehl, Esq., Denver, Colorado, and
William Andrew Wilson, Esq., Denver, Colorado, for Derby Disposal; Metropolitan Trash, Inc.; Ruben Lee; Industrial Disposal; Bestway Disposal; Golden Disposal; Mountain View; Vanish Rubbish Removal; Englewood-Littleton Rubbish Removal; Sunrise Disposal; Dalberg's Hauling Service; B & W Dispose-All Service; Derby Waste Disposal; Dick's Rubbish Removal; Arvada Rubbish Removal; Wheatridge Disposal Service; Aurora and East Denver Trash Disposal; A-Aurora Removal Service; Alex Gerlach & Son Disposal Company; Freddie's Rubbish Removal; Monarch Disposal Company; Lakewood Disposal, Incorporated; Ray's Ash & Trash Service; Broomfield Rubbish Removal; J & R Disposal Trash Co.; and Boulder Disposal, Protestants.

STATEMENT AND FINDINGS OF FACT

BY THE COMMISSION:

Denver Clean-Up Service, Inc., hereinafter referred to as Applicant, is the owner of Certificate of Public Convenience and Necessity PUC No. 3343, which authorizes:

> Transportation of ashes, trash, and other refuse, between points in the City and County of Denver, and from points in the City and County of Denver, to regularly-designated and approved dumps and disposal places in the Counties of Adams, Arapahoe and Jefferson, State of Colorado.

By the instant application authority is sought to extend operations under said Certificate to include the transportation of liquid waste and other refuse in the Counties of Denver, Adams, Arapahoe, Jefferson, and Boulder, State of Colorado, to dump and disposal points regularly designated within said Counties, as well as the Counties of Elbert and Douglas, State of Colorado, excluding all pick-up points located within areas zoned residential within said Counties.

Protests to the application were filed by Derby Disposal; Metropolitan Trash, Inc.; Ruben Lee; Industrial Disposal; Bestway Disposal; Golden Disposal; Mountain View; Vanish Rubbish Removal; Englewood-Littleton Rubbish Removal; Sunrise Disposal; Dalberg's Hauling Service; B & W Dispose-All Service; Derby Waste Disposal; Dick's Rubbish Removal; Arvada Rubbish Removal;Wheatridge Disposal Service; Aurora and East Denver Trash Disposal; A-Aurora Removal Service; Alex Gerlach & Son Disposal Company; Freddie's Rubbish Removal; Monarch Disposal Company; Lakewood Disposal, Incorporated; Ray's Ash & Trash Service; Broomfield Rubbish Removal; J & R Disposal Trash Co.; and Boulder Disposal (collectively referred to as Protestants).

A prior hearing on the matter was held October 14, 1966, before former Commissioner Ralph C. Horton at Denver, Colorado, and on February 27, 1967, the Commission issued its Decision No. 69085 granting the requested authority. On March 20, 1967, the Protestants filed a Petition for Rehearing and on March 29, 1967, the Commission, in its Decision No. 69265, ordered a rehearing de novo in the matter.

Pursuant to notice to all parties, the rehearing de novo was held August 30 and 31, 1967 and October 19, 1967 in Denver, Colorado, before all three Commissioners. At the conclusion thereof, the parties were requested to file statements of position, which they did, and the matter was taken under advisement.

The Applicant is an experienced and financially sound carrier of liquid and solid wastes. It has three roll-off type trucks and one front loading truck, twenty-nine roll-off containers and three portable packers through which it provides service. The Applicant presently provides service

to several large plants in the Denver area. In such service, it has analyzed and assisted in the solution of various waste problems. Similarly, it has surveyed the waste problems of the shippers supporting the instant application and is of the opinion that its container equipment is needed.

Mr. Gordon Watts, Terminal Superintendent for the Union Pacific Railroad, testified in support of the application. Union Pacific presently has a contract with the Applicant for removing rubbish and sawdust that accumulates at the Denver terminal. This service is provided through the use of 40 cubic yard containers. Union Pacific also has trackage at and performs a switching service for Colorado (Omar) Milling and Elevator in Commerce City, Adams County. Until recently, box cars at this location were cleaned and the refuse hauled away in a pickup truck; a service which was satisfactory to Union Pacific. This operation has been discontinued and Union Pacific wants the Applicant to provide this service through use of container equipment. The evidence indicates that the Railroad is aware of the other carriers who are willing to render this service but predicates its wants on its preference to have a single carrier to take care of its needs rather than to have to deal with several carriers. While the desires of the public should be given serious consideration, we should not lose sight of the fact that it is only public convenience and necessity upon which an extension of authority should be granted. If two or more carriers can render the service satisfactorily the inconvenience of the shipper must be subordinated to the requisites of public convenience and necessity. The evidence is clear that this shipper has not tried the service of the carriers who have testified that they stand ready, willing and able to render the service in a satisfactory manner and proves nothing as to the adequacy of their service.

Mr. Ronald Sindall, the Supervisor of the Material Handling Section, Corporate Engineering Division of the Gates Rubber Company of Denver, Colorado, appeared in response to a subpoena and testified concerning his company's waste disposal problems. It appears that the Applicant presently handles exclusively all of the waste material from Gates' Denver plant and has assisted in analyzing and solving its various waste disposal problems. Gates

anticipates an expansion into Arapahoe County with a plant of similar size to the Denver plant now, however there is no definite target date for completion and the "immediate planning is in the nature of beginning activity in about two to three years." From the evidence we find that this shipper has no current disposal problems which are not being adequately taken care of and the evidence as to the future is too indefinite and uncertain to establish future public convenience and necessity.

Mr. Edward Higgins, an employee of the I.B.M. plant near Boulder, Colorado, also appeared in support of the Applicant. The evidence indicates that the protestant, Boulder Disposal, presently provides a satisfactory service of removal of solid wastes from the plant. The liquid wastes, however, consisting of approximately 20 barrels per week of toxic and flammable wastes, are handled by the Applicant under a temporary authority by the use of barrel containers. Boulder Disposal has the barrel equipment and facilities to handle and to dump this liquid waste if the traffic were tendered to it. It has inquired of I.B.M. concerning this traffic, but has been refused as this service is already being handled by someone else. Although the Applicant plans to place container equipment at the plant if the instant application is granted, there is no evidence from the shipper that it needs such equipment or that the presently available barrel equipment is inadequate. In view of the adequate solid waste service being performed by Boulder Disposal and its tendered, yet untried, liquid waste service, the evidence by this shipper contributes nothing to support public convenience and necessity for granting the application.

Mr. Charles Lacy, the Plant Engineer of Gardner-Denver Company of Denver, Colorado, also testified in support of the application. Gardner-Denver has facilities in Denver and Adams County from which waste products must be removed. His testimony is that the solid and liquid wastes from the Denver plant are presently handled by the Applicant, but it desires that Applicant also serve it in Adams County. The non-liquid wastes of the Adams County plant are presently removed by the protestant Derby Disposal and the liquid wastes, which are strictly water solubles, are presently being poured into an open ditch. Gardner-Denver has been told that this use of the open

ditch would have to be discontinued in the future, but no deadline has been given. Should discontinuance of this practice materialize, the necessary service for its removal is available from Derby Disposal even though its offer to provide such service has heretofore been refused. No evidence was proffered to establish that this carrier cannot satisfactorily provide the necessary service.

Witness Clarence Gilber Wilhelm is the President of a tree-trimming company in Arapahoe County, which has a solid waste removal problem in disposing of tree limbs. The evidence indicates that although Mr. Wilhelm desires to use the services of the Applicant, he has not attempted to obtain this service from existing carriers who are authorized and have suitable equipment to provide it. His predicament results from his failure to try the service of authorized carriers.

A number of witnesses testified concerning water and air pollution problems that recent legislation seeks to remedy and the potential impact thereof on the refuse hauling industry. None of these witnesses proffered any testimony concerning the use of carriers, or the ability, or inability, of existing carriers, to adequately handle such traffic should the need arise.

Much of this type of evidence was adduced to show that federal and local authorities are becoming more and more concerned with the disposition of waste materials which create water and air pollution problems. This evidence indicates that more and more responsibility is being, and will be, placed upon the public to make proper disposal of such materials. Thus, more demands for service, and need therefor should result. This evidence, in general, is not of sufficient quality and weight to find that the presently authorized carriers are, or will be, unable to meet such demands. An existing authorized carrier is entitled to additional future new business if it stands ready, willing and able to handle it.

Evidence was adduced by witnesses who stated that they knew of no carrier desiring to, or who could, provide the services needed. Their lack of knowledge does not provide proof that such carriers do not actually exist.

The evidence of the Protestants on the other hand refutes that such a condition exists.

On the evidence of the Applicant itself, it appears that numerous future new demands are in prospect, and that the existing demands are of relatively recent origin. This, in part, explains the contention, though not reasonably proven, that some of the existing carriers already authorized to provide the service may not have the type of equipment which is desired by the shippers. Until such time as public needs for specialized equipment materialize an unjust burden would be imposed on authorized carriers if they should be compelled to have such equipment on a stand-by basis to meet demands which may never materialize.

The fact that an applicant seeks a broad authority greater than that of any and each of the existing authorized carriers, encompassing their areas, the grant of which might "make it easier" for a customer by having one carrier rather than two or more carriers to deal with, of itself, provides no legal basis for granting the application. The fundamental issue is whether or not existing carriers, individually or collectively, can adequately provide the needed services. We find from the evidence that there are such authorized carriers who are available and capable.

The evidence presented on behalf of the Protestants establishes that they are operating the type of equipment requested of them by the public; that they are willing and able to purchase additional and different equipment when the needs of the shipping public so require; that they are actively soliciting new and additional business and have the capacity to handle it; and that they have not refused to provide suitable service to the shipper witnesses involved in this application. The Commission finds that the Protestants, collectively, are authorized, have available, and are providing an adequate transportation service to meet the requirements of the present and future public convenience and necessity of shippers whom the Applicant seeks to serve.

We point out specifically that the Applicant seeks extension of its authority to include also the transportation of "other refuse" in the Counties of Adams, Arapahoe, Jefferson and Boulder, Colorado, to dump and disposal points regularly designated within said Counties, as well as the Counties of Elbert and Douglas, Colorado, excluding all pick-up points located within areas zoned residential within said Counties. The evidence submitted to establish that public convenience and necessity require such extension of its authority is insufficient, vague, and indefinite, if not altogether lacking, and fails to reasonably prove that the existing available service of carriers presently authorized to render such service is lacking or inadequate.

The Commission finds that the Applicant has failed to sustain the burden of proof to establish that public convenience and necessity, present or future, require extension of Applicant's authority as requested.

O R D E R

THE COMMISSION ORDERS:

That Application No. 22155-Extension be, and the same hereby is, denied.

This Order shall become effective twenty-one days from date.

(SEAL)

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

HENRY E. ZARLENGO

EDWIN R. LUNDBORG

Commissioners

COMMISSIONER HOWARD S. BJELLAND DISSENTING.

Dated at Denver, Colorado,
this 5th day of March, 1968

et

ATTEST: A TRUE COPY

William D. Mitchell, Executive Secretary

COMMISSIONER BJELLAND DISSENTING:

I respectfully dissent. Without going into unnecessary detail, I would find as ultimate facts, based on proper intermediate findings of fact, (1) that the existing solid waste as well as liquid waste trash disposal services available to industrial, manufacturing, and commercial business enterprises in the area which Applicant seeks to serve are inadequate, (2) that public convenience and necessity, present and future, require the proposed services of Applicant, limited, however, to service to business enterprises and further limited insofar as removal and disposal of solid waste is concerned to the utilization of roll-off equipment, and (3) that the requisite certificate of public convenience and necessity authorizing the rendition of such service as limited should issue.

(S E A L)

HOWARD S. BJELLAND

Commissioner

Dated at Denver, Colorado,
this 5th day of March, 1968

et

ATTEST: A TRUE COPY

William D. Mitchell, Executive Secretary

EXHIBIT
14

IBM
OFFICE OF COUNSEL
MAR 13 9 34 AM '68
BOULDER, COLORADO

March 11, 1968

Mr. Don Marmande
Boulder County Health Department
3450 Broadway
Boulder, Colorado

Dear Don:

It has come to my attention that IBM is having difficulty disposing of chemical wastes in that they are really not the sort of material in which our composters have an interest, and in that the local trash haulers have objected to the P.U.C. with respect to having out of town haulers take the stuff to Weld County or Denver.

Can you try to bring me up to date by giving me any information you have in this respect.

Yours very truly,

Bill

William L. Paddock
County Attorney

WLP/rr

cc: Robert Cross

EXHIBIT
15

MEMO TO FILE
3-11-68

Confr.: Ken Colton and John Newhauser

Subject: Chemical Waste Disposal

Mr. Newhauser is owner of Sanitation Engineering, a Colorado corporation presently engaged by IBM for the disposal of all trash and rubbage at the Boulder plant site. Mr. Newhauser has been in operation for a little more than one year, and in addition to IBM, serves the Cheyenne Air Force Base and numerous customers around Boulder County. He maintains a separate pickup service within the city limits of Boulder. Newhauser also owns and operates a disposal area in Weld County. The disposal area is a large ravine apparently quite remote from settlements. This dump is a cover-and-fill type of operation and has been inspected both by Weld County and State health officials. The State provided written approval basically as to the location of the site without any investigation in depth. Mr. Glenn Paul, Weld County Health Department official, inspected and approved the dump for disposal of chemical wastes. According to Newhauser, the dump area lies within a heavy clay deposit, which is considered fairly impervious to leeching of chemical substances.

Newhauser has, for some time, indicated an interest in disposing of IBM's chemical wastes. Up until last Friday this was being accomplished by Denver Clean-Up Service. The PUC, however, revoked the temporary permit to haul from Boulder County previously issued to Denver Clean-Up. Anticipating this move, Mr. Newhauser contacted Colton last Wednesday, March 6, and requested an opportunity to formally offer his services. On previous occasions, he has discussed his

capabilities with other IBM personnel, but has not offered his services directly to IBM Purchasing.

Newhauser states he has a flat-bed truck, as well as a covered van, both capable of carrying IBM chemical wastes to his dump area. Newhauser has sized the job by talking with Jim Mains, IRD, and Fred Nelson, SMD. Mains has indicated IRD has a weekly disposal requirement of between 20 - 40 55-gallon drums of ink paste. IRD is presently disposing of its MEK and solvents through a reclamation source. As a result, the MEK and solvents will not be included for the time being. IRD is presently working on a one pickup a week basis.

Fred Nelson indicated for SMD and SDD that the major disposal responsibility involves a 600-gallon underground solvent tank, which must periodically be pumped clean of wastes. Newhauser owns a 750-gallon tank trailer that, he states, is capable of handling the solvent wastes to be disposed of in the underground tank. Nelson also stated a small amount of cyanide and chromic acid must occasionally be disposed of. These chemicals are normally placed in a 1, 2, or 5-gallon safety can. No frequency for disposal of these items is specified, but they should present little problem to Newhauser. His primary responsibility with regard to the latter items will be to establish what form of chemical must be purchased in order to neutralize them and render them relatively safe. Newhauser stated that he was quite familiar with such problems, as he does dispose of similar chemical substances for companies such as Sundstrand. In these cases, he dumps the solutions into open pits where he then treats them with whatever chemical is specified.

Newhauser stated he contemplated no extra charge for hauling away IRD's ink paste if he was able to take a few 55-gallon drums each day along with his normal

pickups from IRD. He sees no problem in hauling the ink=paste and the drum along with the rest of the trash and dumping it in the same general area. No reclamation of the 55-gallon drum is required, according to Jim Mains. Newhauser will prepare a letter to the attention of Ken Colton outlining the manner in which he proposes to accommodate IBM's industrial waste disposal. He will specify his charges for emptying the 600-gallon underground solvent tank, as well as any other incidental waste disposal required. If and when the concept of regular trash disposal at IRD is changed, he may then find it necessary to set forth specific charges for disposal of the 55-gallon drums of ink paste.

In response to my question regarding a recent Greeley newspaper article concerning IBM trash being found blown all over Weld County, Newhauser responded that, due to the frost in the ground, he has as yet been unable to erect a fence around his dump. He already has the posts and proposes to erect a fence as soon as the thaw sets in. Newhauser also proposes to construct a large cage into which our trash will be dumped during winds. After the winds subside, Newhauser will then push the trash out and bury it. Newhauser stated he has both A and B permits from the PUC for hauling all forms of waste away from IBM. He stated specifically that the PUC allows an extremely broad interpretation of the word "wastes", and that all chemicals and solids are considered to be within this definition. Newhauser's lease on the Weld County dump has a 20-year term and a 20-year renewal option. Throughout the conversation, Newhauser was very careful to make no derrogatory remarks with regard to Denver Clean-Up, and he stated that he understood that Denver Clean-Up had provided an adequate service to IBM, but that he, of course, was interested in developing his own area of trade and would most likely fight any Denver Clean-Up attempt to

renew its presently withdrawn permit. I explained to Newhauser that IBM felt no particular loyalties to any one vendor over another and was primarily interested in a good job at reasonable rates. Notwithstanding this, however, I indicated to Newhauser that, when a vendor has done a good and reliable job, IBM felt a reasonable degree of loyalty was due.

RLC

jjd

PUC 2.50

EXHIBIT
13

STATE OF COLORADO

500 COLI
1845 SH[illegible]
DENVER, COLORADO 80203

[illegible]
DENVER, COLORADO [illegible]

AREA CODE 303
TELEPHONE 825-8235

JOHN A. LOVE, GOVERNOR

THE PUBLIC UTILITIES COMMISSION

March 12, 1968

Mr. R. L. Cross
c/o I.B.M. Corporation
6300 Diagonal Highway
Boulder, Colorado 80301

Dear Sir:

Please find enclosed a list of carriers authorized to serve the I.B.M. Plant in the disposal of liquid and solid waste.

If we may be of further assistance, please do not hesitate to contact this department.

Very truly yours,

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

Oscar E. Franz

Oscar E. Franz, Senior Transportation
Representative, Enforcement Division

OEF:sa

Enclosure

CARRIERS AUTHORIZED TO SERVE I.B.M. PLANT AT NIWOT

(1) Bestway Disposal Co. - P.U.C. No. 3235
2460 Grape, Boulder-Colorado

(2) Garrison Trash Service - P.U.C. No. 3340
337 Spruce Street, Boulder-Colorado

(3) Lloyd Gerbitz Rubbish Removal - P.U.C. No. 3411
4220 - 19th Street, Boulder-Colorado

(4) William A. Haney - P.U.C. No. 3720
No. 26th Street Cottonwood Lane, Boulder-Colorado

(5) Boulder Disposal Service - P.U.C. No. 3964
1862 Stillwater Way, Lafayette-Colorado

(6) Lee E. Cardenas - P.U.C. No. 4317
607 North, Boulder-Colorado

(7) Don Shields Disposal - P.U.C. No. 4340
3450 Fordham Court, Boulder-Colorado

(8) O. K. Disposal Service - P.U.C. No. 4360
1955 - 24th Street, Boulder-Colorado

(9) Disposal Service Co., Inc. - P.U.C. No. 3412
P. O. Box 1218, Boulder-Colorado

(10) L & T Sanitation Co. - P.U.C. No. 3417
Route 2, Box 162, Boulder-Colorado

(11) W. H. Hall - P.U.C. No. 3491
1938 - 60th Street, Boulder-Colorado

(12) Bryan C. Boden - P.U.C. No. 3901
3745 Cloverleaf Drive, Boulder-Colorado

(13) Boulder Disposal - P.U.C. Permit No. B-7080
1862 Stillwater Way, Lafayette-Colorado

(14) Metropolitan Trash, Inc. - P.U.C. No. 2127
5790 West 56th, Arvada-Colorado

(15) Don's Disposal - P.U.C. No. 3500
350 - 28th, Boulder-Colorado.

3-13-68
T. Ken Colton
PUC list

Sanit Eng. not on list but 2 others w/ its address are.

1. Contacted TB or re rubbish & paper

2. Nothing

3. Trash

4 Nothing

5. Same Add. as Sanit Eng. - trash & solvent

6. Nothing

7. "

8. "

9. O.B. w/ hand prop - trash only

10. We called them re liq. solvent - machine floor - No place to dump.

11. Nothing

12. "

13. Same Add as S.E.

14. We called re trash only - elim. based on D & B

15. Out of Business

3/13/68

1.T. Ken Colton
PUC List

Sanit Engr not on list but 2 others w/its address are

1. Contacted IBM re rubbish & paper
2. Nothing
3. Trash
4. Nothing
5. Same add as Sanit Engr - Trash & Solvents
6. Nothing
7. "
8. "
9. O.B. w/ hand prop - trash only
10. We called them re liq. solvents - machine floor - no place to dump
11. Nothing
12. "
13. Same add as S.E.
14. We called re trash only - elim. based on D & B
15. Out of Business

This is a transcription of the attached document prepared on 11/13/91 by IBM to expedite review.

EXHIBIT
16

Sanitation Engineering Corp.
1862 Stillwater Way Route 1
Lafayette, Colorado 80026

March 15, 1968

IBM Corporation
P. O. Box 1900
Boulder, Colorado 80302

Attention: Ken Colton
Purchasing Department

Dear Mr. Colton:

We take pleasure in offering this preliminary proposal for removal and disposal of waste chemicals from IBM's property, however, due to the lack of specifications from your company the following qualifications are to be considered a part of this proposal.

1. IBM must identify the chemicals which are being disposed of.
2. If any chemical requires neutralization prior to disposal said neutralization cost will be born by IBM subject, of course, to your approval.
3. IBM will furnish all containers with the exception of one (1) 600 gallon capacity tank truck or trailer and will identify those containers which are to be returned for reuse. If IBM requires that Sanitation Engineering Corp. furnish containers, rental rates must be negotiated based on the type of continers required.
4. This proposal is offered with the understanding that terms are effective only so long as the present trash removal contract with Sanitation Engineering is in effect.

We propose to remove and dispose of the (mix) waste from building 030, contained in disposable 55 gallon drums, at no cost to IBM Corp. It is our understanding that there will be between 20 to 40 of these drums weekly.

We propose in addition to furnish equipment and labor for removal and disposal of all other waste chemicals at a rate of $15.00 per hour, with a 3 hour per call minimum and subject to the above qualifications.

We trust that this proposal will find favorable consideration from your Company and we are at your disposal for any clarification which may be required.

Very truly yours,

John F. Neuhauser, President
Sanitation Engineering Corp.

EXHIBIT
17

Weld County Health Department

P. O. BOX 1227
GREELEY, COLORADO 806

March 18, 1968

To Whom it May Concern:

This letter will introduce to you Mr. John Neuhauser of Lafayette, Colorado. Mr. Neuhauser is the owner and President of Sanitation Engineering Corporation. A Colorado Corporation engaged in the business of trash removal and disposal, Among his assets is a 400+ acre land fill operation located in South West Weld County.

In view of this and othe of his assets, it is our belief that he may be able to suggest a solution to the problems faced by many of our smaller communities in South West Weld County, when the new State Dump Standards go into effect July 1 of this year.

Your courtious consideration of this matter will be greatfully appreciated by me.

Yours truly,

Glen E. Paul
Chief Sanitarian

EXHIBIT
10

DENVER CLEAN-UP SERVICE

Commercial and Industria

803 SOUTH JASON ST. • DENVER, COLORADO 80223 • TEL. 777-5402

March 18, 1968

Mr. K. N. Colton, Buyer
Purchasing Department
IBM Corporation
P. O. Box 1900
Boulder, Colorado 80302

Re: P.O. #03717V710

Dear Sir:

We will be unable to continue our service under the present contract we have with you now due to the Public Utilities Commission denial of the extension of our permit to service the surrounding counties.

Yours truly,

Robert A. Johnson

Robert A. Johnson
Secretary-Treasurer

RAJ:ew

Bob.
For your info
Ken Colton

EXHIBIT

22

July 23, 1968
4780
707/001-3

Review of Sanitation Engineering's Contract Conditions

Our phone conversation of July 23, 1968

Glenn Franklin

Several areas of concern regarding our contract relationship with this firm arose because of an apparently serious fire at the site which Sanitation Engineering evidently drops our trash, waste chemicals and solvents. Would you please secure, in writing, confirmation of this firm's awareness of our following operating practices:

1. His personnel are not to pick up for disposal any chemical or solvent in an unlabeled container.

2. That he is familiar with safe handling procedures of all solvents and chemicals we dispose of through him.

3. That his personnel know what to do at their dump site for safe disposition of all materials removed from IBM Boulder.

4. That he is familiar with all ordinances involved in the disposition of this material and has secured all necessary government agency approvals for disposition of such materials.

Another consideration mentioned by counsel Bob Cross is whether or not Sanitation Engineering has named IBM as an "Additional Insured". This may be a required feature of his contract with us because of public hazards connected with his type of operation.

Mr. Cross asked that he be a party to the letter required to convey our needs to Mr. John Neuhouser, principal of Sanitation Engineering Corporation.

Ralph Rogers

RVR:rc
cc: R. Cross, D. Hess, T. Liguore

EXHIBIT
21

August 12, 1968

Sanitation Engineering
1862 Stillwater Way
Lafayette, Colorado

Attention: John Newhauser

Gentlemen:

Subject: Compliance with safety procedures and waste disposal regulations

To insure that the terms of the agreement between IBM and Sanitation Engineering, dated May 7, 1968, are being complied with, please review your current practices related to the areas of concern listed below. Upon completion of this review, please inform us in writing as to the nature of your compliance with each.

1. Sanitation Engineering personnel should pick up chemicals and solvents only in clearly labled containers and only from the designated pick-up areas. Any unlabled containers should not be picked up.

2. Sanitation Engineering personnel shall be thoroughly familiar with safe handling procedures of any and all solvents and chemicals which are picked up from IBM.

3. Procedures used at Sanitation Engineering's dump site shall be adequate to insure safe disposition of all materials, while complying with all legal requirements.

4. Sanitation Engineering shall be familiar with all ordinances related to the disposition of material and shall have secured all necessary approvals for disposition of any and all materials picked up from IBM.

The above areas are specifically covered by the aforementioned agreement, but recent developments (i.e. the recent fire at your dump site), compel us to re-emphasize the importance of each of the above.

The agreement dated May 7, 1968, also expressly states that Sanitation Engineering will name IBM as an additional insured. The certificate of insurance presently on file for your firm does not indicate that this provision has been implemented. Therefore, please take any action necessary to comply with this provision and have an insurance certificate which indicates that IBM is named as an additional insured submitted to IBM.

Your prompt reply will be appreciated.

Very truly yours,

Original Signed By

T. E. Small, Associate Buyer
Purchasing Department

TES/ss

bcc: R. Cross
G. Franklin
D. Hess
T. Liguore
R. Rogers

EXHIBIT

24

August 22, 1968

COPY

Sanitation Engineering
1862 Stillwater Way
Lafayette, Colorado

Attention: Mr. John Newhauser

Reference: Our meeting of August 16, 1968

Gentlemen:

Subject: Quality of Trash Removal Services

As agreed in the referenced meeting, the steps listed below will be initiated in an attempt to improve the quality of the trash removal service which is currently at an intolerable level.

1. Each employee of Sanitation Engineering will sign in, on a log provided by Mr. Don McGuire, when he arrives ready for work. He will also sign out when he leaves at the end of each shift or for any other reason. Departures to, and arrivals from the dump should also be noted on this log. Any tardiness (or time over 1 1/2 hours for a round trip to and from the dump) will be deducted from your monthly billing at a rate of $2.71 per hour.

2. The equipment on site shall at all times comply with the requirements in the contract for the subject services. Especially important is the requirement that two (2) 20 cubic yard packers be present at all times with allowance for trips to and from the dump. A major problem which we are concerned with, is the condition of your trucks. As agreed in our meeting, it is apparent that the quality of our trash removal service is suffering because of the undue amount of maintenance required during normal working hours to keep the trucks running. Consequently, we are requesting the following reports.

   a. A summary of the condition of each truck as of the state safety inspection and the expiration dates of

the safety inspection stickers for each truck. This should be submitted by August 26, 1968.

b. A comprehensive report stating all problems or deficiencies for each truck which will be used upon IBM premises will be submitted to me no later than August 22, 1968. Included in this report will be the proposed corrective measures, and the planned completion dates thereof, for each of the deficiencies.

c. Beginning August 30, 1968, weekly reports will be submitted to Mr. Bob McGuire of IBM, summarizing the lost productive time of your employees caused by any type of break-down or malfunction of your trucks or just plain being out of gas. Proposed corrective measures, and completion dates therefor, should be included in these weekly reports. Also included in the weekly reports will be detailed explanations for any non-performance that is caused by equipment down time.

As agreed in the referenced meeting, your performance and any change therein, will be appraised beginning immediately through September 20, 1968. At the completion of this evaluation period, we will decide whether Sanitation Engineering is capable of continuing the present workload at IBM Boulder's facility. If your performance indicates that you are not capable of continuing the present workload, a decision will be made to terminate whatever portions of the present workload necessary to insure that the quality of trash removal service is satisfactory.

If you have any questions regarding the implementation of the above, please contact me.

Very truly yours,

Original Signed By
T. B. Small, Associate Buyer
Purchasing Department

TBS/ss

bcc: G. Franklin
D. Hess
T. Liguore
B. McGuire
E. Newquist
R. Rogers

EXHIBIT
12

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

× × ×

IN THE MATTER OF THE APPLICATION OF DENVER CLEAN-UP SERVICE, INC., 803 SOUTH JASON, DENVER, COLORADO, FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING EXTENSION OF OPERATIONS UNDER PUC NO. 3343.

COPY

OFFICE OF COUNSEL
IBM
BOULDER, COLORADO
AUG 29 9 14 AM '67

APPLICATION NO. 22155-Extension

BOL 003 BOL 003

SUBPOENA TO TESTIFY

THE PEOPLE OF THE STATE OF COLORADO

TO: Robert Higgins or William Rogers
I.B.M.
Boulder, Colorado

GREETINGS

WE COMMAND YOU THAT ALL AND SINGULAR, BUSINESS AND EXCUSES BEING LAID ASIDE, YOU APPEAR AND ATTEND BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO AT A HEARING OF SAID COMMISSION, TO BE HELD AT THE HOUR OF 10:00 O'CLOCK, A. M., ON THE 30TH DAY OF AUGUST, 19 67,

THEN AND THERE TO TESTIFY IN THE ABOVE ENTITLED MATTER.

BY ORDER OF THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

WITNESS MY HAND AND THE SEAL OF THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO, AT DENVER, COLORADO, THIS 28th DAY OF AUGUST, A. D. 19 67.

(SEAL)

WILLIAM D. MITCHELL
Executive Secretary

COPY

EXHIBIT

25

COPY

9-12-68

I.T. Herb Horn

Chem. Waste Disposal

John Newhauser has failed to perform re removal of Chemicals & is also performing poorly in " of Trash. Terry Smith has proposed a meeting to resolve the problem.

I advised a ltr to Newhauser specifying his failure & putting him on notice re consequences I will review the ltr before it is sent.

Upon my return from Rochester I will visit the P.U.C. & inform them of our problem & the inabil. to develops other adequate haulers.

9-12-68

1.T. Herb Horn
Chem Waste Disposal

John Neuhauser has failed to perform re removal of chemicals & is also performing poorly in removal of trash. Terry Smail has proposed a meeting to resolve the problem.

I advised a ltr to Neuhauser specifying his failure & putting putting him on notice re consequences. I will review the ltr before it is sent.

Upon my return from Rochester I will visit the PUC & inform them of our problem & the inabil. to develop other adequate haulers.

This is a transcription of the attached document prepared on 11/13/91 by IBM to expedite review.

EXHIBIT
26

COPY

9-26-68

O. T. Ed Naugent
- Trash Collection

I understands that Newhauser is now doing better than at last rpts several weeks ago. Apparently there is no agitation now to remove him.

We agreed that a list of competent haulers must be developed so that prompt action can be taken if we experience any further difficulty. I asked Ed & Terry Swait to review all current prospects & to supplement our PUC listing w/ anyone new Tom Langworth who they have heard of.

I will be prepared to visit the PUC w/ a request for addl auth for competent haulers from the Denver area if our local lists fall flat. Ed thinks this visit might do a lot to blast Newhauser into better performance.

Acctng to Ralph Rogers our costs are quite a bit higher than those for comparable plants. We may wish to take advantage of Newhauser's rent for

9-26-68

O.T. Ed Newquist
Trash Collection

Ed understands that Neuhauser is now doing better than at last rpts several weeks ago. Apparently there is no agitation now to remove him.

We agreed that a list of competent haulers must be developed so that prompt action can be taken if we experience any further difficulties. I asked Ed & Terry Smail to review all current prospects & to supplement our PUC listing w/ everyone new from Longmont who they have heard of.

I will be prepared to visit PUC w/ a request for add'l auth. for competent haulers from the Denver area if our local lists fall flat. Ed thinks this visit might do alot to blast Neuhauser into better performance.

Acc'ding to Ralph Rogers our costs are quit a bit higher than those for comparable plants. We may wish to take advantage of Neuhauser's next failure to rebid on this bases any way.

RC

This is a transcription of the attached document prepared on 11/13/91 by IBM to expedite review.

EXHIBIT
27

COPY

MEMO TO FILE
10-25-68

Subject: PUC

IBM desires to develop a multiple source for trash collection at the Boulder facility. Theoretically, we accomplish this by either building up a local contractor or bringing in someone from the surrounding area. In practice, we have no local alternatives to Sanitation Engineering, so we must attempt to get some help from a Denver area contractor.

This involves consent from the Public Utilities Commission of Colorado to the extension of a Denver licensee into the Niwot area.

In order to obtain such an extension, it is necessary to demonstrate public convenience and necessity. What constitutes public convenience and necessity is not spelled out. The statutory section regarding Private Motor Carriers (i.e., contract carriers of petroleum products) requires a showing that the present service is not adequate. The section on Motor Vehicle Carriers (which a trash hauler is by express designation) does not require a demonstration of inadequacy.

In fact, the statute recites that "the doctrine of regulated competition shall prevail." This statute was amended in 1967, apparently to overrule a series of court decisions invoking the policy of "regulated monopoly."

The outlook of the law on its face is favorable ~~then~~ to the introduction of some competition without the express need for showing present

services inadequate. This does not speak to the mental framework of practice and procedure which the PUC in fact follows.

A likely tack to take would be to identify a carrier now performing acceptable services for one of the Denver Branch facilities and have him request an extension in order to give complete service to his customer.

W Blair

W. H. Blair

ah

cc: R. L. Cross - 802/001-1

c. Cop EXHIBIT 28

Date: October 25, 1968
From (location): SMD
U.S. mail address): Boulder
Dept. & Bldg.: 359/910
Telephone Ext.: 7470

IBM OFFICE OF COUNSEL
FEB 25 9 15 AM '69
BOULDER, COLORADO

Bank Lost Waste

IBM

Subject: Trash Removal Services

Reference:

To: Mr. R. V. Rogers

COPY

Refer to your letter of 10/14/68 regarding subject. We agree that we need improved sources.

Although finding several sources is next to impossible in the area, we will cooperate and make every effort to do so.

We think dividing the trash removal activities is a good approach providing Area Counsel is successful with Public Utilities Commission.

I have instructed Mr. Newquist and Mr. Smail to start gathering information immediately in order to place the 1969 contract on time.

Have Mr. McGuire contact Mr. Smail regarding this project.

G.W. Franklin

G.W. Franklin
Purchasing Manager

GWF/np

cc: E.C. Connolly
R.L. Cross
O.J. Davenport
D.W. Hess
T.J. Liguore
T.E. Smail
E.W. Newquist

EXHIBIT
30

COPY

January 28, 1969

Metropolitan Trash, Inc.
5790 West 56th
Arvada, Colorado

Subject: IBM Inquiry No. 06164 T

Gentlemen:

You are cordially invited to submit proposals for trash removal service at IBM's Building 910 located on County Road 39, Boulder, Colorado. In submitting your proposal, please quote prices for a one year contract, a two year contract, and a three year contract. Each quote should show the monthly cost to IBM for each of these periods. IBM may select to award the contract for one, two or three years.

We request that you bid on the service described below, but you may submit, in addition to the requested quote, any alternate proposal which you feel is appropriate.

A.) Pick ups shall be made four (4) times per day, six (6) days per week.

Tentative pick up times are:

1.) Between 4:30 A.M. and 5:30 A.M.
2.) Between 12:30 P.M. and 1:30 P.M.
3.) Between 4:00 P.M. and 5:00 P.M.
4.) Between 11:00 P.M. and 12:00 P.M.

B.) Expected quantity of trash per pick up is approximately 30 cubic yards.

C.) Approximately 8 cubic yards of wood shall be picked up each trip.

D.) Supplier shall furnish a minimum of ten (10) 2 cubic yard containers equipped with casters and lids.

E.) The dock, dock apron, and surrounding area shall be cleaned of all loose trash on each pick up.

Each bidder should visit IBM to survey the site. Arrangements for a tour can be made by contacting Mr. Bob McGuire at 447-4935.

Bids are due no later than 2:00 P.M. on February 4, 1969.

If you have any questions, please contact me.

Very truly yours,

T. E. Smail, Associate Buyer
Purchasing Department

TES/bg

EXHIBIT
34

January 30, 1969

COPY

Sanitation Engineering Corporation
1862 Stillwater Way
Route #1
Lafayette, Colorado

Attention: Dale Widener

Subject: Our Meeting of January 14, 1969

Dear Sir:

This letter will confirm our conversation in the subject meeting during which you were informed that at present IBM does not intend to ask Sanitation Engineering Corporation to bid on our Trash Removal Requirements. This decision was made because of the poor quality of services performed and because of the lack of response to IBM's requests for performance of the services specified in your contract.

As mentioned in our meeting of the 14th, IBM will consider reversing this decision only if there is a tremendous improvement in both your service and response time by February 14, 1969. To date, such improvement has not been forthcoming.

Unless you are notified by IBM to the contrary, the contract with Sanitation Engineering Corporation for Trash Removal Service at the Main Plant Site and Building 910 will terminate as scheduled on February 28, 1969.

Very truly yours,

T. E. Smail, Associate Buyer
Purchasing Department

TES/bg

cc: G. W. Franklin
E. W. Nowquist

EXHIBIT

29

COPY

January 31, 1969

Purchasing
354/910
4339

Potential Trash Removal Suppliers

Ralph V. Rogers

The attached list summarizes purchasing's contacts with those trash haulers who are authorized by the Colorado P.U.C. to operate in the area of IBM Boulder's plant. Please note that of the thirteen suppliers contacted, there are five that appear to be qualified. These five are Bestway Disposal Company, Garrison Trash Service, Gerbitz Rubbish Removal, Golden Van Lines, Inc., and Metropolitan Trash, Inc.

If there are no objections to the above group, only these five contractors will be included in the requests for quotations for trash removal service at IBM Boulder.

Your questions and comments concerning this summary are welcomed.

Original Signed By

T. S. Small, Associate Buyer
Purchasing Department

TSS/bg

cc: W. M. Blair
G. W. Franklin
D. W. Hess
E. W. Newquist

NAME	LOCATION	INTEREST	CAPABILITY	D & B	COMMENTS
Bestway Disposal Company (Don's Disposal) (3235)	2460 Grape Boulder, Colo.	Medium	Largest in Boulder, could purchase new equipment on 2-3 year contract. Employees - 7	Good 44,934	Excellent quality Dump Fees ($12 load) Called Prohibitive
Byron C. Boden Trash (3901)	3745 Cloverleaf Drive Boulder, Colo.	Weak	One Truck, No Employees	Fair?	Appears too small fo our needs
Lee E. Cordenas (4317)	607 North St. Boulder, Colo.	Weak	Two Trucks, No Employees	Fair 3,000	Appears too small
Garrison Trash Service (3340)	337 Spruce St. Boulder, Colo.	Fairly Strong	Three Trucks	Good	Has good residential business
Gerbitz Rubbish Removal (3411)	4220-19th St. Boulder, Colo.	Good for small area only	Good equipment, primarily a residential hauler, not interested in expanding. Employees - 1	Fair?	Would be okay at 910 or similar.

NAME	LOCATION	INTEREST	CAPABILITY	D & B	COMMENTS
Golden Van Lines, Inc.	311 Kimbark St. Longmont, Colo.	Fairly Strong	Trucks - 2, Interested and capable of purchasing new equipment on 2-3 year agreement.		No dump hour restrictions. Has good mgt.
W. H. Hall (3491)	1938-60th St. Boulder, Colo.	Unable to contact	N/A	N/A	
William A. Haney (3720)	4247-26th St. Boulder, Colo.	None	One Truck, No Employees	Poor less than 300	Too small - no financial strength.
L & T Sanitation Co. (3417)	Rt. 2, Box 162 Boulder, Colo.	None	None - This party is primarily a sewer cleaner.	Poor	
Metropolitan Trash, Inc. (2127)	5790 W 56th Arvada, Colo.	Very Strong	Four trucks - 4 employees Can purchase other equipment on 2-3 year contract	Good 6100	Seem capable, good ideas presented in interview.

NAME	LOCATION	INTEREST	CAPABILITY	D & B	COMMENTS
OK Disposal Service (4360)	1955-24th St. Boulder, Colo.	None	1 - Hand Packer No Employees	Fair	Too Small
Sanitation Engineering Corp. (3964)	1862 Stillwater Way Lafayette, Colo.	Strong?	Trucks - 8, Several employees	Fair 3000	This is our present contractor. Extremely poor experience. Poor mgt. and poor maintenance of equipmen
Don Shields Disposal (4340)	3450 Fordham Ct. Boulder, Colo.	Weak - None	Trucks - 1, No Employees	Fair ?	Apparently too smal

EXHIBIT
31

February 5, 1969

COPY

Metropolitan Trash, Inc.
5790 West 56th
Arvada, Colorado

Subject: Inquiry No. 06169

Gentlemen:

Please submit bids for trash removal service from IBM Buildings 001, 011, 021, 022 and 030 in accordance with the attached specifications. Bids should be for (1) one year period; (2) two year period; and (3) a three year period. In addition to your proposal for the specified service you may submit any other proposal which you feel is applicable.

Bids are due no later than 2:00 P.M., February 10, 1969.

To arrange a tour of the IBM location, contact Mr. Bob McGuire at 447-5618.

If you have any other questions, please contact me.

Very truly yours,

T. E. Smail, Associate Buyer
Contract Procurement

TES/bg

Attachment

EXHIBIT

36

February 7, 1969

COPY

Purchasing
354/910
4339

Our Telephone Conversation of February 6, 1969

W. H. Blair

This is to confirm notification to you of the conversation that I had with Glenn Paul of the Weld County Department of Health. Mr. Paul came to me and asked who we did business with at Sanitation Engineering. I asked him the purpose of his inquiry and he said that he was going to schedule Sanitation Engineering for a hearing on their dump site in Weld County and close it for lack of compliance with Weld County ordinances. I informed him that we dealt with Mr. Dale Widener and during the course of conversation asked him when the dump would possibly be closed and to keep me informed of all proceedings against Sanitation Engineering. He said that it would probably be between 15 and 30 days before the dump would be closed and he would send me a record of the proceedings. He did seem confident at the time that the dump would be closed in as much as this was the second hearing.

Original Signed By

George S. Willis
Assistant Buyer
Contract Procurement

GSW/bg

cc: E. W. Newquist
T. S. Small

7134 3-1-83

EXHIBIT
32

February 10, 1969

COPY

Metropolitan Trash, Inc.
5790 West 56th
Arvada, Colorado

Subject: IBM Inquiry No. 06164 T

Gentlemen:

The due date for the subject inquiry is hereby extended to 2:00 P.M. on February 10, 1969.

Very truly yours,

T. E. Smail, Associate Buyer
Contract Procurement

TES/bg

EXHIBIT
33

COPY

February 10, 1969

Metropolitan Trash, Incorporated
5790 West 56th
Arvada, Colorado

Subject: Inquiry No. DC 06140 - 0109

Gentlemen:

Due to some confusion on the original request for quotations, the subject inquiry is hereby being rebid.

In submitting your new proposals, please indicate (1) a price per trip to remove chemicals; (2) your proposed dumping site; (3) your proposed method of transfer and disposal.

The solvents to be removed will be in 55 gallon drums. There will be approximately 65 drums generated per week.

In addition to bidding in the above manner, your proposals for alternate methods of disposal are welcomed. To arrange for a tour of the pickup facilities, please contact Mr. Herb Horn at 447-4553. Please supply quotations for a one year period and a two year period.

Bids are due no later than February 19, 1969 at 2:00 P.M.

Your continued interest in IBM is solicited.

Very truly yours,

T. E. Smail, Associate Buyer
Contract Procurement

TES/bg

EXHIBIT

23

COPY

February 13, 1969

Sanitation Engineering Corporation
Post Office Box 883
Boulder, Colorado 80302

Attention: Dale Wiedner

Subject: Your Invoice Dated December 24, 1968

Reference: Purchase Order No. DC 06133 CS 710

Dear Sir:

In accordance with my telephone conversation with your office on February 12, 1969, I am returning the subject invoice to you because it lists 46 hours at $7.50 each. The price agreed upon when the order was placed was for three loads at $50.00 a piece.

If you have any questions, please contact me, if not, please submit your revised invoice to our Accounts Payable Department.

Thank you for your cooperation.

Very truly yours,

Original Signed By

T. E. Smail, Associate Buyer
Contract Procurement

TES/bg

bcc: Accounts Payable

7134 3-4-83 MP

EXHIBIT
35

COPY

Date: February 20, 1969

From (location or U.S. mail address): Purchasing

Dept. & Bldg: 354/910

Tieline & Tel. Ext.: 4339

IBM

Subject: Inquiry 06164 - Trash Removal

Reference:

To: File

Following the receipt and analysis of the bids received in response to subject inquiry it was apparent that there are factors either unknown or unconsidered by IBM which are of major consequence. In an attempt to acertain facts, as perceived by potential suppliers, and the attitudes of the bidders, I made appointments to discuss our situation with all those suppliers who were invited to bid. Contractors talked to were:

Gerbitz Rubbish Removal -
Frank Dietz Company
Bestway Disposal Company -
Golden Transfer, Inc.-
Garrison Trash Service -
Metropolitan Trash, Inc. -

The result of these discussions are as follows:

Gerbitz Rubbish Removal

Gerbitz did not respond to the inquiry. In a telecon, Mr. Gerbitz stated that he was not interested in undertaking such a large account primarily because he felt he couldn't handle it in a quality manner. I thanked him for his time.

Frank Dietz Company

On February 17, 1969, Mr. John Rogers, a partner, and I discussed his bid for Building 910 and problems. This firm bid $2,500/month for 910 only. In analyzing his bid it became apparent that Mr. Rogers was interested in expanding, but felt he may lose money at the price he bid. I told him that IBM would not award the bid to a vendor who was aware he would lose money on the contract. Mr. Rogers seemed very unsure of any costs related to his bid.

Discussing methods and problems was of little value. Mr. Rogers said he hadn't perceived any problems. I asked him if he had considered other methods of removal such as stationary compactors He hadn't. At the conclusion of our meeting, Mr. Rogers was still interested in serving IBM.

Bestway Disposal Company

On February 14, 1969, I talked with Mr. Leichtner of Bestway. He stated he had not bid because he felt we would consider his bid much to high. Mr. Leichtner pointed out that many people in the business considered IBM a bad place to do business because they had put two firms (Clarence Bosman and Sanitation Engineering) out of business. He couldn't see how Sanitation Engineering did the work for the price they did. I assured him that IBM expects vendors to make a fair return on their investment and that we treated suppliers at least fairly at all times.

Leichtner's opinion was that we had two problems. One, the exhoIbidant dump fees at Colorado Compost and, the present method of removal. He indicated interest in serving IBM with a stationary system - but only on his terms. He seemed to understand the nature of costs associated with his business. Upon leaving Mr. Leichtner mentioned he had adequate capitol to purchase equipment and offered to come in with a representative of such equipment.

Personal visit but uninterested

Golden Transfer, Inc.

Golden did not bid and advised us of this prior to the due date. Medical reasons precluded the necessary time and effort to prepare a proposal. Mr. Ken Winter visited me on February 18, 1969. Mr. Winter had no first hand knowledge with our system so could not comment on problems or methods. He seemed interested and asked if he could have a tour when he felt better - a matter of two or three weeks.

Mr. Winter stated that Golden is applying for a license to use their spacious gravel pits as sanitary land fills. He felt confident that their application will be approved in about 4 - 6 weeks.

Garrison Trash Service

interested

On February 18, 1969, I discussed Garrison's bid of $6,000/month for Building 910 and $4,000/month for Buildings 001, 021, 022, 030 and 011 with Mr. Raleigh Garrison, owner. He seemed to have a fair handle on his costs. He stated that 24 hour labor was a problem. Wood also was a problem. Without wood, truck cost would be reduced by approximately $7-8000 per unit.

In reviewing alternate methods, Mr. Garrison thought a stationary system might be good, but was not familiar with them.

Metropolitan Trash, Inc.

2

This firm made no response. Repeated attempts were made to contact Mr. Schnoor, but were unsuccessful. On February 14, 1969, an assistant called, informed me Mr. Schnoor was out of town for the week, said they were interested, and offered to meet with me during the week of February 24, 1969.

In addition to the above, On February 19, 1969, I talked with Mr. Ken Cooper who represents Anchorpac compacting equipment. Based on figures mentioned during that meeting, it appears that a stationary compacting system is competitive with our present method. Delivery of such a system is about 60 days.

To extend Sanitation Engineering for 60 days they request a rate revision from $5,952.88 per month to $8,393.52 per month.

All of the above will be discussed in detail on February 20, 1969 by B. Blair, D. Hess, R. McGuire, E. Newquist, R. Rogers and myself.

Original Signed by

T. E. Smail, Associate Buyer
Contract Procurement

TES/bg

cc: B. Blair
D. Hess
R. McGuire
G. Franklin
E. Newquist
R. Rogers

EXHIBIT

38

3/25/69 suspense 20 day WB

24.1

IBM

Date: 3/4/69

From (location or mail address):

Dept. & Bldg.: 720/002

Telephone Ext.:

Subject: Meeting 3/4/69 - IBM Chemical Waste Site Considerations

COPY

Reference: Weld County Dump

To: FILE

A meeting was held on subject date to discuss IBM's further obligation to appraise the hazard and determine what action should be taken at the Weld County Dump.

The problem under investigation is in regard to potential water-air pollution and explosion-fire risks brought about by buried MEK solvent drums and other chemical wastes including cyanide buried at the site.

Our obligation is a moral community issue as well as an obligation to meet Federal, State and Local health department regulations.

Many unanswered questions exist regarding contract, PU permits, Dept. of Health authorizations, contractor reliability etc. which represent risk to IBM in the event some fault is traced to the dump, even at some future period.

A consultant from Stearns-Rogers will be contracted to appraise the existing conditions and advise IBM of risk potential and if apparent, a solution to the problem.

F.T. Williams

/cw

EXHIBIT
37

Date: March 7, 1969
From (location U.S. mail address): 710/005
Dept. & Bldg.:
Telephone Ext.: 4916

IBM
OFFICE OF COUNSEL
MAR 13 9 51 AM '69
BOULDER, COLORADO

IBM

Subject: Summary of Current Trash Removal Activities

Reference:

To: File

COPY

In way of summarizing our activities to date regarding trash removal the following actions have been taken.

Several meetings have been held between Maintenance Services, Industrial Eng., Purchasing and Plant Counsel, From these meetings we recognize the need to expand our sources of supply for trash removal service. This was done by contacting the Public Utilities Commission and getting a list of all eligible haulers in the area. D & B's were run on these people and bids were sent out for work at Buildings 001, 021, 022 and 030 at the main plant and the Chesapeake Building.

Bids were sent out to the six haulers who are considered large enough to provide us with satisfactory service. Tours were given to three of these bidders and bids were received from two of them. All bids were rejected because of cost. Purchasing talked with the six vendors to find out why they either did not bid or the reason for such high bids. Reasons varied between haulers but some of them were:

1. IBM wants too much service for too little cost.
2. Hauler is afraid if he takes a contract with IBM he will go broke-as rumor has it this has happened to two past haulers.
3. The demand for odd hours service is too great.
4. Not large enough to come to the IBM plant 4 times/day without jeopardizing the service provided on other commercial routes.
5. Do not want to expand my business anymore.
6. Problem handling the wood.

From the comments by these vendors and other interested parties, it was decided IBM must find an alternate method for handling and disposing of their trash. Bob McGuire contacted the other IBM locations and obtained information from them on their cost, volume,

and handling methods. Purchasing invited the local representatives of trash removal and equipment manufacturers to tour our facility and propose to us the method or methods they consider best for disposing of our trash. Industrial Engineering is studying the problem of internal trash handling as well as external trash removal.

Trips have been made around the Denver area by representatives of Maintenance Services, Purchasing and Industrial Engineering to observe the operation of different types of trash handling equipment. To date the most promising of these have been the stationary compactor method.

We hope to receive from the area manufacturers and haulers, their proposals by mid-March and from this develop our specifications and requirements. By April 1, we want to have these specifications to the vendors for their firm's consideration and bids.

A request has been made to Plant Engineering for assistance in instituting our proposed method of trash handling so proper alterations can be made to the facility to accomodate any equipment required.

Our present vendor was given a 90 day extension on his contract to provide us with service until a more satisfactory method can be developed and put into operation.

D. W. Hess

DWH: c
cc: W. Blair
O. Davenport
R. McGuire
T. Smail
R. Rogers

EXHIBIT

39

Stearns-Roger
CORPORATION
ENGINEERS · CONSTRUCTORS
ESTABLISHED 1885

660 BANNOCK STREET P. O. BOX 5888, DENVER, COLORADO 80217
PHONE 303-222-8484 TWX 910-931-0453 TELEX 045-540

March 10, 1969

International Business Machines
Systems Manufacturing Division
Post Office Box 1900
Boulder, Colorado 80301

Attention: Mr. E. Newquist

Subject: Waste Disposal

Gentlemen:

Pursuant to our meeting on March 6th, Stearns-Roger proposes to accomplish the necessary investigation and prepare a report on the waste disposal system and possible changes that should be made in the future.

This study will require approximately four weeks and will involve making several trips to your facility as well as to the dump area in Weld County. Stearns-Roger will need information from IBM pertaining to the various types of chemical waste and the quantities of these wastes.

It is our understanding that IBM will utilize their chemical analysis laboratory group to perform the necessary analysis on any of the sludge and waste.

The study will also encompass the following:

A. An analysis of the wastes and potential problems the wastes may pose.

B. Recommended methods of disposal of these wastes.

C. Recommendations on the waste dump operations and if certain precautions should be taken with the existing burried waste.

We are in the position to immediately start on this project, and Mr. ~~Bill~~ Black will be the project engineer on this effort. The total price, including ten copies of the final report and all the necessary trips to Weld County and your facilities in developing this report, is $2,500.00.

Stearns-Roger appreciates the opportunity to submit this proposal.

Very truly yours,

STEARNS-ROGER CORPORATION

W. R. Peavy
Project Manager
Special Projects Division

WRP/lb

(Newquist has copy)

11/3/87
Weld - Laidlaw/
Western Disp. LF

COPY

Administrative Issues

1 CD amended twice - once to use high subsidence area & once to use Pratt Property
D&O plan reflects use of Pratt Property
are CD conditions consistent from original thru 1st & 2nd amendments
are CD conditions being followed

2 SUP's one for 16 acres & one for Pratt Property each @ own
set of conditions - are they consistent @ CD

Do CD's ever expire

Substantial deviations from CD
Base & Final grades
Drainage
Volume?

~~CERCLA~~ S'fund Investigation of Pratt Property

Pratt property is leased

Transfer of owner - amendment to CD
new owner has to be able to comply with existing D&O Plan

EXHIBIT 1

IBM PERSONNEL INTERVIEWED

EMPLOYEE	JOB DESCRIPTION
A. Arnold, Bob	Engineering Manager 1966-1980
B. Bocim, Warren	Safety Engineer, Chemical Coordinator 1966-1971
C. Browne, Mike	Machine Maintenance, Dept. Technician 1966-1968
D. Bustamante, George	Purchasing Agent
E. Campbell, Gary	Environmental Engineer Manager 1973-1983
F. Converse, Ken	Machine Maintenance 1966-1979
G. Davies, Jim	Machine Maintenance 1972-1978
H. Denight, Ron	Machine Maintenance 1965
I. Duncan, Chuck	Chemical Distribution 1975-1989
J. Frazier, Elwyn	Facilities Engineer 1969-1976
K. Freeman, Lee	Machine Maintenance 1972-1976
L. Gerbrandt, Gordon	Plating Area Manager
M. Hein, Phil	Machine Maintenance 1972-1983
N. Hollis, Chilson	Facilities Engineer 1968
O. Joffs, Eric	Facilities Engineer Environmental Manager 1967-1979
P. King, Phil	Machine Maintenance, 1966- 1979

Q.	Martin, John	Chemical Control 1987-1983
R.	McGuire, Bob	Facilities Maintenance
S.	McKeeman, Kathleen Kallhoff	Laboratory Technician 1978-1981
T.	O'Grady, Bob	Machine Maintenace 1970
U.	Parsons, Mark	Environmenatal Engineer Manager 1981-1990
V.	Stone, Dick	Purchasing Agent 1970-1983
W.	Waits, Ron	Machine Maintenance 1966-1068
X.	Webster, David	Facilities Environmental Engineer 1968-1976
Y.	Wengert, Jim	Chemical Distribution 1966-1989
Z.	Williams, Frank	Safety Engineer Manager 1965-1978

IBM

COPY

International Business Machines Corporation

P.O. Box 1900
Boulder, Colorado 80301-9191
303/924-6300

November 20, 1991

US Environmental Protection Agency
Mr. Gregory Phoebe
Superfund Remedial Branch, 8HWM-SR
999 18th Street, Suite 500
Denver, Colorado 80202-2405

Dear Mr. Phoebe:

REQUEST FOR INFORMATION PURSUANT TO SECTION 104 OF CERCLA FOR ERIE SOUTH LANDFILL SITE IN WELD COUNTY, COLORADO

This letter and the attached response are in reply to your letter dated October 11, 1991 regarding EPA's interest in gathering information pertaining to the Erie landfill. IBM appreciates the extension of time to November 27, 1991 given in a telephone conversation between you and Ms. Susan Peil of my staff on October 18, 1991, and confirmed by a letter from your office dated October 22, 1991.

As you have also discussed with Ms. Peil, IBM's response to the numerous questions in your request is made up of a narrative format designed to provide as clearly as possible a complete picture of IBM's involvement at Erie. Our response is made up of several sections, beginning with the narrative response, a personnel interviewed summary, the document exhibits, and finally an index to your specific questions.

The information submitted in this package has been summarized and organized to present a logical explanation of the events. Since IBM's involvement with Erie began over twenty years ago, the details of events are not complete. However, due to waste site information gathering and document retention programs begun in 1982 we have been able to save and present information that would have normally been lost. Where documents are of poor copy quality or from handwritten notes we have provided transcriptions along with the document.

We feel this response package will give you a good background on the history of the Erie landfills as well as IBM's use of the sites over the years. If you have any questions or require clarification after reviewing the enclosed response, please feel free to contact us. Technical questions about the documents may be directed to Ms. Susan Peil at 924-6593. Legal questions may be addressed to Mr. Terry McElroy at 924-4989.

Sincerely,

Robert W. Arnold
Manager, Facilities Engineering
700/004
303-924-6565

91324BLB0025

COPY

Response to Instructions

A revised format has been prepared based on a telephone conversation on October 18, 1991 between Mr. Greg Phoebe of EPA and Ms. Susan Peil of IBM. A narrative response is provided that, rather than noting question numbers prior to each paragraph, uses the following index to locate each question. Where questions are not answered in the narrative, because they may not apply to IBM, or do not fit within our response format, they are answered within the index.

No confidential protection is requested. Where documents have confidential notations these notations have not been removed for historical reasons, but the documents are no longer considered confidential to IBM.

Index to Specific Numbered Questions

The following index provides guidance to locating questions that have been responded to in the response text. It also provides actual responses to some questions. Questions that do not apply to IBM are noted and/or omitted.

1. This response has been prepared by the staff of IBM Boulder's Environmental Engineering Dept, supervised by Susan P. Peil, IBM Senior Associate Engineer.

2. A number of people have been consulted in preparing responses to this request. IBM began gathering information about Erie in 1982. At that time a number of employees were interviewed about IBM's past waste activities at various sites including Erie. Again in 1991, in preparation of this response, several available employees were interviewed. Many of those interviewed in 1982 have since retired or have left IBM. This response contains information gathered during both interview sessions. The persons listed in the attached Personnel Summary Sheet are referenced in the text by the corresponding letter for that person noted on the summary.

3. Specific documents used to support this response are referenced in the text and have been individually numbered and attached as exhibits.

4. The IBM Boulder EPA RCRA number is found on Page 1, Paragraph 1 of the main response document. This number was assigned to hazardous waste drum and tank storage units.

5. Personnel, including IBM past and present employees, that have knowledge about Erie have been identified in the Personnel Summary Sheet (Exhibit 1) See also Question 16 below.

6. IBM has never had any direct arrangements or contracts with Kenneth Pratt or Karen Landers. These two people are one time owners of the Erie landfill site. While using Erie, IBM dealt only with operators of the site. See page 14 paragraph 2 of the main response text. IBM has dealt directly with Laidlaw Waste Systems for disposal of trash and toner related waste at Erie. See the discussion on page 14 paragraph 3 of the main response text. IBM has had no dealings with the Town of Erie.

7. See page 5 paragraphs 2 - 12 and page 14 paragraph 4 through page 17 of the response text for information about dates when wastes were shipped to Erie landfill. IBM intended the waste materials sent to Erie to be buried. See page 1 paragraph 4 through page 4 paragraph 4 and page 14 paragraph 4 through page 16 paragraph 2 of the response text for information about the processes that generated wastes sent to Erie.

8. See page 10 paragraph 2 through page 11 paragraph 2, and page 14 paragraph 4 through page 16 of the response text for information about nature of the wastes sent to Erie.

9. As noted in the response text, IBM has had no active involvement in the operations at the Erie site. IBM has no direct knowledge, therefore, of any releases of hazardous substances from the site. The response page 11 paragraphs 4 and 5, page 12 paragraph 1, and page 13 paragraph 3 and 4 provides types and volumes of materials IBM sent to Erie, and Exhibit 74 provides information on other transporters and generators that may have used Erie.

Sub-question g of this question deals with investigations of releases. Response text page 8 paragraphs 3 and 4 and page 12 paragraph 1 discusses a fire, wind blown trash and other problems at Erie. Groundwater monitoring data and summaries gathered from agency files by IBM's consultants (Exhibits 40, 45, 53) may also be of interest.

Sub-question h seeks personnel information about releases. Various documents noted above, including Exhibits 45, 53 and 74 contain agency, public and operator's names that may have such information.

10. This question focuses on material handling activities at the Erie site. Since IBM had no active role in activities at the Erie site, we can provide only limited information about this topic. We believe our responses to question 12 below cover this question as well.

11. Other than IBM, other users mentioned by personnel or in documents are identified on page 7 paragraph 3, page 8 paragraph 1, and page 13 paragraph 5 through page 14 paragraph 3 and in Exhibits 45 and 74. These references include companies and individuals authorized by the PUC to haul in the area (and presumably using the site), those that lived or operated near the site, and those identified to our personnel as using the site. We have no direct knowledge that these persons or companies ever used Erie, however.

12.a. IBM was the generator.

b. See page 6 paragraph 5 through page 9 paragraph 4, and page 14 paragraph 4 through page 17 of response text.

c. See same as b.

d. IBM sent materials to Erie from 1968 to present, excluding 1979 to 1983.

e. See page 10 for chemical information.

f. See page 10 paragraph 3.

g. See page 10 paragraph 3.

h. See page 14 paragraph 4 through page 16.

i. IBM owned the materials until they were transferred to Erie.

j. No waste analyses have been found for the chemical waste sent to Erie. No manifests have been found.

k. See page 11 paragraph 4 and 5 for personal recollections of the location of wastes at Erie.

l. IBM has had no control over where wastes were buried at the Erie site.

m. See page 7 paragraph 3 through page 8 paragraph 2 for information about the Erie selection process.

n. See page 8 paragraph 5 through page 9 paragraph 1 for payment information.

o. See page 11 paragraph 4 for site waste handling information.

p. See page 11 paragraph 5 for information about where the containers were buried.

q. See page 11 paragraphs 4 and 5 for information on IBM's efforts to determine how waste was actually handled at Erie.

r. See page 11 paragraph 3, and page 10 paragraph 4 for information about container types, numbers, and labels.

13. and 14. These questions deal with transporters. IBM has never owned or operated any off-site waste transportation services. The only information available about transporters can be found on response text page 6 paragraph 2, page 7 paragraph 2, and page 17 paragraph 2.

Sub-question l. deals with persons who may have selected where waste materials would be transported. In the early years there appears to have been no specific direction given to transporters. This changed by 1968. IBM still used independent transporters but specified the location to which they should carry waste materials. See response page 7 paragraph 3, page 12 paragraph 4, and page 17 paragraph 2. In the case of Erie, the owner of the transportation company was often the dump operator, so it was assumed, and was in fact the case, that the transporter used the Erie site. In cases where separate companies were used (Western Disposal for trash to Erie or Longmont dumps, etc) the decision to use a specific carrier or disposal site would most often be made jointly by Environmental Engineering, Traffic and Purchasing departments as discussed in the response text on page 17 paragraph 1.

15. This question asks IBM to provide the names of other persons who may be able to provide more information about Erie. In addition to the many documents listed in this response that contain the names of non-IBM personnel involved in the site, we assume many agency personnel, local residents, local officials, PUC authorized carriers, current and previous landowners and site operators could provide information. Response text page 7 paragraph 3 and page 8 paragraph 1 also addresses this issue.

16. We believe the persons mentioned in question 15 may have additional information pertaining to Erie landfill.

CHEMICAL WASTE PRODUCING PROCESSES - IBM BOULDER FACILITY

Systems Manufacturing Division

Building Number	Product	Process	Waste Stream	Disposal Vendor	Date Vendor Used
003	Computer Tape Drives	MachiningTape Drive Parts	Coolants, Water, & Mineral Spirits	Waste Transport (Lowry)	1966-1979
			Metal Shavings	Iron & Metals, Inc. (Denver)	1966-1989
	Copier/Printer Machines	Machining Copier & Printer Parts	Coolants, Water, & Mineral Spirits	Waste Transport (Lowry)	1966-1989
			Metal Shavings	Iron & Metals, Inc. (Denver)	1966-1989
004	Computer Tape Drives	Machining Tape Drive Parts	Coolants, Water, & Mineral Spirits	Waste Transport (Lowry)	1966-1979
			Metal Shavings	Iron & Metals, Inc. (Denver)	1966-1989
		Molding Plastic Parts for Tape Drives	Hydraulic Oils & Coolants	Waste Transport (Lowry)	1966-1979
		Plating Tape Drive Heads	Copper, Chrome & Nickel	Conservation Chemical (Kansas City)	1969-1974
		Machining Tape Drive Heads	Coolant & Water	Waste Transport (Lowry)	1966-1979
			Metal Shavings	Iron & Metals, Inc. (Denver)	1966-1989
			Metal Particles on Filters	Sanitation Engineering, Corp. (Erie Landfill)	1968
002		AME Laboratories	Acids, Bases & Organic Solvents	Denver Clean-Up Services, Denver	1966-March 1968
				Sanitation Engineering, Corp.	May 1968-May 1969

EXHIBIT 3

Information Record Division

Building Number	Product	Process	Waste Stream	Disposal Vendors	Dates Vendors Used
030	Magnetic Tape	Magnetic Tape Manufacturing	Iron Oxide, MEK, & Toluene	Denver CleanUp Service, Denver	1966-May 1968
				Sanitation Engineering Corp. (Erie Landfill)	May 1968-May 1969
				Conservation Chemical Co.	May 1969-Jan 1974
				Seymour Mfg. Co.	
				SCA-Model Cities, NY	1974-1976
			Waste Media Product	Sanitation Engineering, Corp.	1966-1979
				Longmont	1979-1983
				Erie Landfill	1984-1986
	Photoconductor	Photoconductor Manufacturing	THF, Toluene, NBA, EDA, Dyes, & Resins	Seymour Mfg.	1976-1978
			Waste Product	Erie Landfill	1976-1979
				Longmont Landfill	1979-1983
				Erie Landfill	1984-1990
031	Toner	Toner Manufacturing	Carbon Black & Resins-Waste Product	Erie Landfill	1976-1979
				Longmont Landfill	1979-1983
				Erie Landfill	1984-1990
	Developer	Developer Manufacturing	Steel Shot & Toner Waste Product	Erie Landfill	1978-1979
				Longmont Landfill	1979-1983
				Erie Landfill	1984-1990
			MEK & Paint	Seymour Mfg. Co.	1976-1978

Systems Development Division

021,022	Development Laboratories	Acids, Bases & Organic Solvents	Conservation Chemical Seymour Mfg. Co. Rollins - Houston TX Nuclear Engineering, NM ENSCO, El Dorado, AR	1969-1974 1976-1978 1976-1980 1978-1980 1975-1990

Overall Site Administration Offices

001, 011, 910 Subsequent Buildings		Trash, Debris	Erie Landfill Longmont Landfill Erie Landfill	1966-1979 1979-1983 1984-1991

S.P.P.-Prepared November 20, 1991.

File · Weld Co

COLORADO DEPARTMENT OF ..ALTH
(Division) ~~or Section~~ of Waste Management

INTER-OFFICE COMMUNICATION

TO : Ned Hoark, File

DATE : 1/25/82

FROM: O Stoddard

SUBJECT: Telephone Inquiry
Mr. Lynn Kiernes (330-2641)

Mr. Kiernes contacted me concerning the following:
. Land farming of "car wash pumpings" at the Erie landfill site. He was advised that if this was a deviation from the approved report and plan an amendment was required. He indicated he would have his consultant do so. (Ven Nelson)
. They plan to expand the site operation to adjacent property. He was advised that this is a "new site" that requires an application in accordance with the "Solid Waste Act". He plans to contact (Ven Nelson).
. They are negotiating with Farmer Co. to assume the operation of the Loveland-Ft Collins site and locate a transfer facility to serve Estes Park. He indicated he would not assume liability for past practices.
. The finalized "Bird Hazard Study" is due in February.
. Lynn is also considering operating the Longmont site in Weld Co.

O Stoddard
Signature

Laidlaw South/Wld. Co.

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue
Denver, Colorado 80220
Phone (303) 320-8333

Roy Romer
Governor

Thomas M. Vernon, M.D
Executive Director

November 16, 1987

Mr. Don Starrett
Manager, Western Landfill
1740 Weld County Raod 6
Erie, Colorado 80516

Dear Don:

Per our phone conversation on November 13, 1987, I have enclosed the Department's policy on grit disposal at sanitary landfills. If you have any questions regarding the policy, please contact me at 331-4846.

Sincerely,

Stephen J. Orzynski

Stephen J. Orzynski, P.E.
Public Health Engineer
Hazardous Materials and
Waste Management Division

SJO:clb/2335K

cc: Wes Potter, Weld County Health Dept.

Enclosure

COLORADO DEPARTMENT OF HEALTH
Division or Section of Waste Management

INTER-OFFICE COMMUNICATION

TO : Ken Waesche, Joan Sowinski

DATE : March 7, 1984

FROM: Ned Noack

SUBJECT: File '84 Columbine Landfill Asbesto Incident

On March 2, 1984, we received a complaint from a Wyoming asbestos removal contractor about negligent asbestos handling at the Columbine Landfill in Weld County, Colorado. According to the complaint, hundreds of bags of asbestos were lying on the ground surface or along fence lines. Many of those were ripped and were allowing asbestos to be blown offsite. Craig Beck and I arrived at the site at 4 p.m. in time to observe a contractor disposing of six bags of asbestos in an area several hundred feet west of the present working face. The bags were quickly covered with soil by a dozer operator. We walked from there back to the working face, which was at the eastern boundary of the recently designated Pratt Property site. During that walk, we saw three ripped yellow bags containing asbestos, but no visible emissions from these bags was occurring. We noticed no yellow bags along the site's east boundary fence line. From there, we walked north about one hundred feet, then west several hundred feet along recently active disposal areas. We noticed one to three ripped yellow bags of asbestos, again with no visible emissions. We noticed no yellow bags along the site's north boundary fence line. We reviewed the facility's records, which showed an average of 900 bags accepted per month. In comparing our inspection to the complaint, I felt that there was little to no hazard to the public from asbestos emissions.

NN:pjs

cc: Craig Beck
Ron Stow, Director Environmental Health, Weld County Health

Ned Noack
Signature

AD BUS-29 (10-29-100)

ATTACHMENT B

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

EPA

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D980635379

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
COLUMBINE LANDFILL (PRATT PROPERTY)	1750 WELD COUNTY ROAD 6

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
ERIE (?)	CO	80516	WELD	123	CO-04

09 COORDINATES LATITUDE	LONGITUDE	
40 42 04.0	105 01 22.0	NE¼ NE¼ SEC 29 T1N R68W

10 DIRECTIONS TO SITE (Starting from nearest public road)
WEST FROM INTERSTATE 25 TO WELD COUNTY ROAD 7; NORTH 2 MILES TO WELD COUNTY ROAD 6; WEST ABOUT ½ MILE TO LANDFILL ENTRANCE

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
KENNETH PRATT	1921 PANORAMA CIRCLE

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER	WORK
LONGMONT	CO	80501	(303) 776-6822	776-4495

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
KIERNES CORPORATION	1333 WEST 120TH SUITE 210

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
NORTHGLENN	CO	80234	(303) 450-2755

13 TYPE OF OWNERSHIP (Check one)
☑ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☐ A. RCRA 3001 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☑ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: 6 15 81 (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☑ YES DATE 3 2 84 (MONTH DAY YEAR)
☐ NO

02 (Check all that apply)
☐ A. EPA ☐ B. EPA CONTRACTOR ☑ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)	03 YEARS OF OPERATION		
☑ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1965 (?) (BEGINNING YEAR)	PRESENT (ENDING YEAR)	☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
- SOLVENTS AND UNSPECIFIED ORGANICS } IBM CONTRIBUTED 84000 GALLONS IN ABOUT 1500
- INORGANICS } 55-GALLON DRUMS FROM 1965 TO 1969
- ACIDS, BASES
- SMALL QUANTITIES HAZARDOUS WASTE MIXED W/ INDUSTRIAL, COMMERCIAL, AND RESIDENTIAL REFUSE

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
- POTENTIAL SHALLOW GROUNDWATER AND SURFACE WATER CONTAMINATION
- ASBESTOS DISPOSAL (UNTIL 3/15/84)

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☑ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
MARK PARSONS-IBM (303) 447-7764 STEVE ORZYNSKI	COLORADO LANDFILL INC.	(303) 450-2755

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
NED NOACK	STATE	DEPT. HEALTH	(303) 320-8333	3 23 84 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
CO	D 980 [illegible]

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

NOT OBSERVED

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES (Spills/runoff/standing liquids/leaking drums) — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

IBM CONTACT MARK PARSONS (303) 447-7764
OTHER NOTIFICATIONS FROM:
BROWNING FERRIS INDUSTRIES OF COLORADO - JOHN THOMASSON, DISTRICT MGR (303) 892-6285
WESTERN DISPOSAL INC. - DANNY L. SOUDERS, PRESIDENT (303) 444-2037

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

CDH/WMD WELD CO. SW FILES, APCD files
EPA NOTIFICATION OF HAZARDOUS WASTES

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D980635329

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER _____ (Specify)
- ☐ E. SLURRY
- ☑ F. LIQUID (?)
- ☐ G. GAS

02 WASTE QUANTITY AT SITE

(Measures of waste quantities must be independent)

TONS _____

CUBIC YARDS _____

NO. OF DRUMS ±1500

03 WASTE CHARACTERISTICS (Check all that apply)

- ☑ A. TOXIC
- ☑ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☑ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS ✓			primarily MEK, MIBK, CYCLOHEXANONE
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS ✓			
IOC	INORGANIC CHEMICALS ✓			
ACD	ACIDS ✓			
BAS	BASES ✓			
MES	HEAVY METALS			TOTAL OF ± 84000 GALLONS IN 1500 DRUMS FROM 1965-1969.

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D980635379

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☑ A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☑ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
KNOWN SOLVENT DISPOSAL OCCURRED AT THIS SITE, BUT CONTAMINANTS FROM THOSE SOLVENTS HAVE NOT BEEN FOUND IN MONITOR WELLS AS YET

01 ☑ B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☑ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
THE SHALLOW ALLUVIAL GROUNDWATER EVENTUALLY DAYLIGHTS AND WOULD FLOW TOWARDS COAL CREEK, ABOUT ½ MILE WEST OF THE SITE

01 ☐ C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: 3/2/84) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

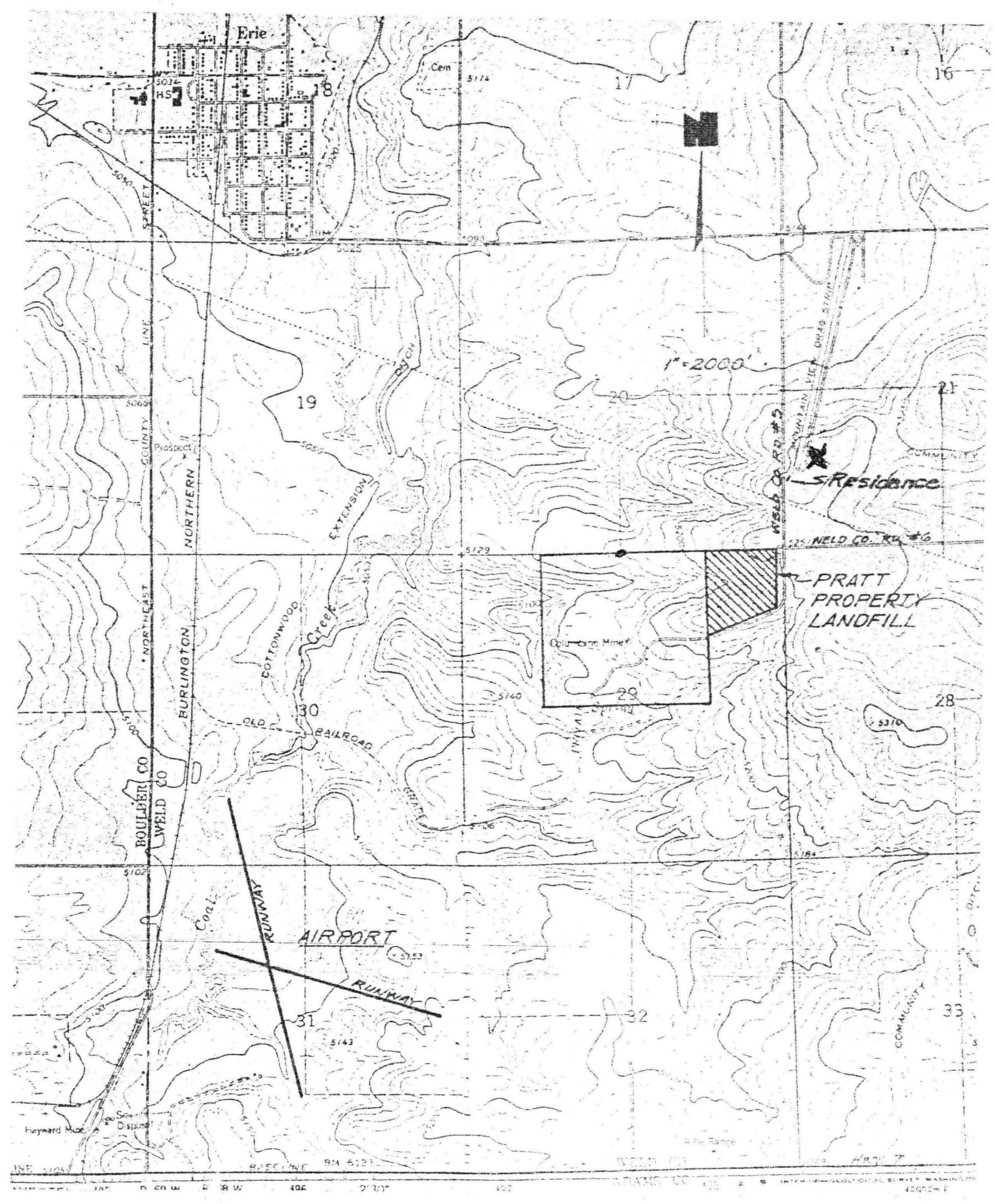
01 ☐ E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: _____ (Acres)
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED



VICINITY MAP

II. HAZARDOUS SUBSTANCES

CAS Number	Chemical Name
137. 7783-50-8	Ferric Fluoride
138. 10421-48-4	Ferric Nitrate
139. 10028-22-5	Ferric Sulfate
140. 10045-89-3	Ferrous Ammonium Sulfate
141. 7758-94-3	Ferrous Chloride
142. 7720-78-7	Ferrous Sulfate
143. 206-44-0	Fluoranthene
144. 50-00-0	Formaldehyde
145. 64-18-6	Formic Acid
146. 110-17-8	Fumaric Acid
147. 98-01-1	Furfural
148. 86-50-0	Guthion
149. 76-44-8	Heptachlor
150. 118-74-1	Hexachlorobenzene
151. 87-68-3	Hexachlorobutadiene
152. 67-72-1	Hexachloroethane
153. 70-30-4	Hexachlorophene
154. 77-47-4	Hexachlorocyclopentadiene
155. 7647-01-0	Hydrochloric Acid (Hydrogen Chloride)
156. 7664-39-3	Hydrofluoric Acid (Hydrogen Fluoride)
157. 74-90-8	Hydrogen Cyanide
158. 7783-06-4	Hydrogen Sulfide
159. 78-79-5	Isoprene
160. 42504-46-1	Isopropanolamine Dodecylbenzenesulfonate
161. 115-32-2	Kelthane
162. 143-50-0	Kepone
163. 301-04-2	Lead Acetate
164. 3687-31-8	Lead Arsenate
165. 7758-95-4	Lead Chloride
166. 13814-96-5	Lead Fluoborate
167. 7783-46-2	Lead Fluoride
168. 10101-63-0	Lead Iodide
169. 18256-98-9	Lead Nitrate
170. 7428-48-0	Lead Stearate
171. 15739-80-7	Lead Sulfate
172. 1314-87-0	Lead Sulfide
173. 592-87-0	Lead Thiocyanate
174. 58-89-9	Lindane
175. 14307-35-8	Lithium Chromate
176. 121-75-5	Malthion
177. 110-16-7	Maleic Acid
178. 108-31-6	Maleic Annydride
179. 2032-65-7	Mercaptodimethur
180. 592-04-1	Mercuric Cyanide
181. 10045-94-0	Mercuric Nitrate
182. 7783-35-9	Mercuric Sulfate
183. 592-85-8	Mercuric Thiocyanate
184. 10415-75-5	Mercurous Nitrate
185. 72-43-5	Methoxychlor
186. 74-93-1	Methyl Mercaptan
187. 80-62-6	Methyl Methacrylate
188. 298-00-0	Methyl Parathion
189. 7786-34-7	Mevinphos
190. 315-18-4	Mexacarbate
191. 75-04-7	Monoethylamine
192. 74-89-5	Monomethylamine
193. 300-76-5	Naled
194. 91-20-3	Naphthalene
195. 1338-24-5	Naphthenic Acid
196. 7440-02-0	Nickel
197. 15699-18-0	Nickel Ammonium Sulfate
198. 37211-05-5	Nickel Chloride
199. 12054-48-7	Nickel Hydroxide
200. 14216-75-2	Nickel Nitrate
201. 7786-81-4	Nickel Sulfate
202. 7697-37-2	Nitric Acid
203. 98-95-3	Nitrobenzene
204. 10102-44-0	Nitrogen Dioxide
205. 25154-55-6	Nitrophenol (all isomers)
206. 1321-12-6	Nitrotoluene
207. 30525-89-4	Paraformaldehyde
208. 56-38-2	Parathion
209. 608-93-5	Pentachlorobenzene
210. 87-86-5	Pentachlorophenol
211. 85-01-8	Phenanthrene
212. 108-95-2	Phenol
213. 75-44-5	Phosgene
214. 7664-38-2	Phosphoric Acid
215. 7723-14-0	Phosphorus
216. 10025-87-3	Phosphorus Oxychloride
217. 1314-80-3	Phosphorus Pentasulfide
218. 7719-12-2	Phosphorus Trichloride
219. 7784-41-0	Potassium Arsenate
220. 10124-50-2	Potassium Arsenite
221. 7778-50-9	Potassium Bichromate
222. 7789-00-6	Potassium Chromate
223. 7722-64-7	Potassium Permanganate
224. 2312-35-8	Propargite
225. 79-09-4	Propionic Acid
226. 123-62-6	Propionic Anhydride
227. 1336-36-3	Polychlorinated Biphenyls
228. 151-50-8	Potassium Cyanide
229. 1310-58-3	Potassium Hydroxide
230. 75-56-9	Propylene Oxide
231. 121-29-9	Pyrethrins
232. 91-22-5	Quinoline
233. 108-46-3	Resorcinol
234. 7446-08-4	Selenium Oxide
235. 7761-88-8	Silver Nitrate
236. 7631-89-2	Sodium Arsenate
237. 7784-46-5	Sodium Arsenite
238. 10588-01-9	Sodium Bichromate
239. 1333-83-1	Sodium Bifluoride
240. 7631-90-5	Sodium Bisulfite
241. 7775-11-3	Sodium Chromate
242. 143-33-9	Sodium Cyanide
243. 25155-30-0	Sodium Dodecylbenzene Sulfonate
244. 7681-49-4	Sodium Fluoride
245. 16721-80-5	Sodium Hydrosulfide
246. 1310-73-2	Sodium Hydroxide
247. 7681-52-9	Sodium Hypochlorite
248. 124-41-4	Sodium Methylate
249. 7632-00-0	Sodium Nitrate
250. 7558-79-4	Sodium Phosphate, Dibasic
251. 7601-54-9	Sodium Phosphate, Trib
252. 10102-18-8	Sodium Selenite
253. 7789-06-2	Strontium Chromate
254. 57-24-9	Strychnine and Salts
255. 100-420-5	Styrene
256. 12771-08-3	Sulfur Monochloride
257. 7664-93-9	Sulfuric Acid
258. 93-76-5	2,4,5-T Acid
259. 2008-46-0	2,4,5-T Amines
260. 93-79-8	2,4,5-T Esters
261. 13560-99-1	2,4,5-T Salts
262. 93-72-1	2,4,5-TP Acid
263. 32534-95-5	2,4,5-TP Acid Esters
264. 72-54-8	TDE
265. 95-94-3	Tetrachlorobenzene
266. 127-18-4	Tetrachloroethane
267. 78-00-2	Tetraethyl Lead
268. 107-49-3	Tetraethyl Pyrophosphate
269. 7446-18-6	Thallium (I) Sulfate
270. 108-88-3	Toluene
271. 8001-35-2	Toxaphene
272. 12002-48-1	Trichlorobenzene (all isomers)
273. 52-68-6	Trichlorfon
274. 25323-89-1	Trichloroethane (all isomers)
275. 79-01-6	Trichloroethylene
276. 25167-82-2	Trichlorophenol (all isomers)
277. 27323-41-7	Triethanolamine Dodecylbenzenesulfonate
278. 121-44-8	Triethylamine
279. 75-50-3	Trimethylamine
280. 541-09-3	Uranyl Acetate
281. 10102-06-4	Uranyl Nitrate
282. 1314-62-1	Vanadium Pentoxide
283. 27774-13-6	Vanadyl Sulfate
284. 108-05-4	Vinyl Acetate
285. 75-35-4	Vinylidene Chloride
286. 1300-71-6	Xylenol
287. 557-34-6	Zinc Acetate
288. 52628-25-8	Zinc Ammonium Chloride
289. 1332-07-6	Zinc Borate
290. 7699-45-8	Zinc Bromide
291. 3486-35-9	Zinc Carbonate
292. 7646-85-7	Zinc Chloride
293. 557-21-1	Zinc Cyanide
294. 7783-49-3	Zinc Fluoride
295. 557-41-5	Zinc Formate
296. 7779-86-4	Zinc Hydrosulfite
297. 7779-88-6	Zinc Nitrate
298. 127-82-2	Zinc Phenolsulfonate
299. 1314-84-7	Zinc Phosphide
300. 16871-71-9	Zinc Silicofluoride
301. 7733-02-0	Zinc Sulfate
302. 13746-89-9	Zirconium Nitrate
303. 16923-95-8	Zirconium Potassium Fluoride
304. 14644-61-2	Zirconium Sulfate
305. 10026-11-6	Zirconium Tetrachloride

APPENDIX

I. FEEDSTOCKS

CAS Number	Chemical Name
1. 7664-41-7	Ammonia
2. 7440-36-0	Antimony
3. 1309-64-4	Antimony Trioxide
4. 7440-38-2	Arsenic
5. 1327-53-3	Arsenic Trioxide
6. 21109-95-5	Barium Sulfide
7. 7726-95-6	Bromine
8. 106-99-0	Butadiene
9. 7440-43-9	Cadmium
10. 7782-50-5	Chlorine
11. 12737-27-8	Chromite
12. 7440-47-3	Chromium
13. 7440-48-4	Cobalt
14. 1317-38-0	Cupric Oxide
15. 7758-98-7	Cupric Sulfate
16. 1317-39-1	Cuprous Oxide
17. 74-85-1	Ethylene
18. 7647-01-0	Hydrochloric Acid
19. 7664-39-3	Hydrogen Fluoride
20. 1335-25-7	Lead Oxide
21. 7439-97-6	Mercury
22. 74-82-8	Methane
23. 91-20-3	Napthalene
24. 7440-02-0	Nickel
25. 7697-37-2	Nitric Acid
26. 7723-14-0	Phosphorus
27. 7778-50-9	Potassium Dichromate
28. 1310-58-3	Potassium Hydroxide
29. 115-07-1	Propylene
30. 10588-01-9	Sodium Dichromate
31. 1310-73-2	Sodium Hydroxide
32. 7646-78-8	Stannic Chloride
33. 7772-99-8	Stannous Chloride
34. 7664-93-9	Sulfuric Acid
35. 108-88-3	Toluene
36. 1330-20-7	Xylene
37. 7646-85-7	Zinc Chloride
38. 7733-02-0	Zinc Sulfate

II. HAZARDOUS SUBSTANCES

CAS Number	Chemical Name
1. 75-07-0	Acetaldehyde
2. 64-19-7	Acetic Acid
3. 108-24-7	Acetic Anhydride
4. 75-86-5	Acetone Cyanohydrin
5. 506-96-7	Acetyl Bromide
6. 75-36-5	Acetyl Chloride
7. 107-02-8	Acrolein
8. 107-13-1	Acrylonitrile
9. 124-04-9	Adipic Acid
0. 309-00-2	Aldrin
11. 10043-01-3	Aluminum Sulfate
12. 107-18-6	Allyl Alcohol
13. 107-05-1	Allyl Chloride
14. 7664-41-7	Ammonia
15. 631-61-8	Ammonium Acetate
16. 1863-63-4	Ammonium Benzoate
17. 1066-33-7	Ammonium Bicarbonate
18. 7789-09-5	Ammonium Bichromate
19. 1341-49-7	Ammonium Bifluoride
20. 10192-30-0	Ammonium Bisulfite
21. 1111-78-0	Ammonium Carbamate
22. 12125-02-9	Ammonium Chloride
23. 7788-98-9	Ammonium Chromate
24. 3012-65-5	Ammonium Citrate, Dibasic
25. 13826-83-0	Ammonium Fluoborate
26. 12125-01-8	Ammonium Fluoride
27. 1336-21-6	Ammonium Hydroxide
28. 6009-70-7	Ammonium Oxalate
29. 16919-19-0	Ammonium Silicofluoride
30. 7773-06-0	Ammonium Sulfamate
31. 12135-76-1	Ammonium Sulfide
32. 10196-04-0	Ammonium Sulfite
33. 14307-43-8	Ammonium Tartrate
34. 1762-95-4	Ammonium Thiocyanate
35. 7783-18-8	Ammonium Thiosulfate
36. 628-63-7	Amyl Acetate
37. 62-53-3	Aniline
38. 7647-18-9	Antimony Pentachloride
39. 7789-61-9	Antimony Tribromide
. 10025-91-9	Antimony Trichloride
+1. 7783-56-4	Antimony Trifluoride
42. 1309-64-4	Antimony Trioxide
43. 1303-32-8	Arsenic Disulfide
44. 1303-28-2	Arsenic Pentoxide
45. 7784-34-1	Arsenic Trichloride
46. 1327-53-3	Arsenic Trioxide
47. 1303-33-9	Arsenic Trisulfide
48. 542-62-1	Barium Cyanide
49. 71-43-2	Benzene
50. 65-85-0	Benzoic Acid
51. 100-47-0	Benzonitrile
52. 98-88-4	Benzoyl Chloride
53. 100-44-7	Benzyl Chloride
54. 7440-41-7	Beryllium
55. 7787-47-5	Beryllium Chloride
56. 7787-49-7	Beryllium Fluoride
57. 13597-99-4	Beryllium Nitrate
58. 123-86-4	Butyl Acetate
59. 84-74-2	n-Butyl Phthalate
60. 109-73-9	Butylamine
61. 107-92-6	Butyric Acid
62. 543-90-8	Cadimium Acetate
63. 7789-42-6	Cadmium Bromide
64. 10108-64-2	Cadmium Chloride
65. 7778-44-1	Calcium Arsenate
66. 52740-16-6	Calcium Arsenite
67. 75-20-7	Calcium Carbide
68. 13765-19-0	Calcium Chromate
69. 592-01-8	Calcium Cyanide
70. 26264-06-2	Calcium Dodecylbenzene Sulfonate
71. 7778-54-3	Calcium Hypochlorite
72. 133-06-2	Captan
73. 63-25-2	Carbaryl
74. 1563-66-2	Carbofuran
75. 75-15-0	Carbon Disulfide
76. 56-23-5	Carbon Tetrachloride
77. 57-74-9	Chlordane
78. 7782-50-5	Chlorine
79. 108-90-7	Chlorobenzene
80. 67-66-3	Chloroform
81. 7790-94-5	Chlorosulfonic Acid
82. 2921-88-2	Chlorpyrifos
83. 1066-30-4	Chromic Acetate
84. 7738-94-5	Chromic Acid
85. 10101-53-8	Chromic Sulfate
86. 10049-05-5	Chromous Chloride
87. 544-18-3	Cobaltous Formate
88. 14017-41-5	Cobaltous Sulfamate
89. 56-72-4	Coumaphos
90. 1319-77-3	Cresol
91. 4170-30-3	Crotonaldehyde
92. 142-71-2	Cupric Acetate
93. 12002-03-8	Cupric Acetoarsenite
94. 7447-39-4	Cupric Chloride
95. 3251-23-8	Cupric Nitrate
96. 5893-66-3	Cupric Oxalate
97. 7758-98-7	Cupric Sulfate
98. 10380-29-7	Cupric Sulfate Ammoniated
99. 815-82-7	Cupric Tartrate
100. 506-77-4	Cyanogen Chloride
101. 110-82-7	Cyclohexane
102. 94-75-7	2,4-D Acid
103. 94-11-1	2,4-D Esters
104. 50-29-3	DDT
105. 333-41-5	Diazinon
106. 1918-00-9	Dicamba
107. 1194-65-6	Dichlobenil
108. 117-80-6	Dichlone
109. 25321-22-6	Dichlorobenzene (all isomers)
110. 266-38-19-7	Dichloropropane (all isomers)
111. 26952-23-8	Dichloropropene (all isomers)
112. 8003-19-8	Dichloropropene-Dichloropropane Mixture
113. 75-99-0	2-2-Dichloropropionic Acid
114. 62-73-7	Dichlorvos
115. 60-57-1	Dieldrin
116. 109-89-7	Diethylamine
117. 124-40-3	Dimethylamine
118. 25154-54-5	Dinitrobenzene (all isomers)
119. 51-28-5	Dinitrophenol
120. 25321-14-6	Dinitrotoluene (all isomers)
121. 85-00-7	Diquat
122. 298-04-4	Disulfoton
123. 330-54-1	Diuron
124. 27176-87-0	Dodecylbenzenesulfonic Acid
125. 115-29-7	Endosulfan (all isomers)
126. 72-20-8	Endrin and Metabolites
127. 106-89-8	Epichlorohydrin
128. 563-12-2	Ethion
129. 100-41-4	Ethyl Benzene
130. 107-15-3	Ethylenediamine
131. 106-93-4	Ethylene Dibromide
132. 107-06-2	Ethylene Dichloride
133. 60-00-4	EDTA
134. 1185-57-5	Ferric Ammonium Citrate
135. 2944-67-4	Ferric Ammonium Oxalate
136. 7705-08-0	Ferric Chloride

example, do not measu e same amounts of waste as both tons and cubic yards.

*II-03 Waste Characteristics: Check all appropriate entries to indicate the hazards posed by waste at the site. If waste at the site poses no hazard, check Not Applicable.

III. **Waste Category**: General categories of waste typically found are listed here. Enter the estimated gross amount of the category of waste next to the appropriate substance name and enter the unit of measure used with the estimate.

*III-01 Gross Amount: Gross Amount is the estimate of the amount of the waste category found at the site. Estimates should be furnished in metric tons (MT), tons (TN), cubic meters (CM), cubic yards (CY), drums (DR), acres (AC), acre feet (AF), liters (LT), or gallons (GA). Enter the estimated amount next to the appropriate waste category.

*III-02 Unit of Measure: Enter the appropriate unit of measure: MT (metric tons),TN (tons), CM (cubic meters), CY (cubic yards), DR (number of drums), AC (acres), AF (acre feet), LT (liters), or GA (gallons), next to the estimate of gross amount.

III-03 Comments: Comments may be used to further explain, or provide additional information, about particular waste categories.

IV. **Hazardous Substances:** Specific hazardous, or potentially hazardous, chemicals, mixtures, and substances found at the site are listed here. This information may not be available at the Preliminary Assessment stage. Substances for which information is available are to be listed here. For each substance listed those data items marked with an "at" sign (@) must be included.

@IV-01 Category: Enter in front of the substance name the three character waste category from Section III which best describes the substance, e.g., OLW (Oily Waste).

@IV-02 Substance Name: Enter one of the following: the name of the substance registered with the Chemical Abstract Service, the common or accepted abbreviation of the substance, the generic name of the substance, or commercial name of the substance.

@IV-03 CAS Number: Enter the number assigned to the substance when it was registered with the Chemical Abstract Service. Refer to the Appendix for most frequently cited CAS Numbers. CAS Numbers must be furnished for each substance listed. If a CAS Number for this substance has not been assigned, enter "999".

@IV-04 Storage/Disposal Method: Enter the type of storage or disposal facility in which the substance was found: SI (surface impoundment, including pits, ponds, and lagoons), PL (pile), DR (drum), TK (tank), LF (landfill), LM (landfarm), OD (open dump).

IV-05 Concentration: Enter the concentration of the substance found in samples taken at the site.

IV-06 Measure of Concentration: Enter the appropriate unit of measure for the measured concentration of the substance found in the sample, e.g., MG/L, UG/L.

V. tocks

V-01 Feedstock Name: If feedstocks, or substance derived from one or more feedstocks, are presen at the site, enter the name of each feedstock found See the Appendix for the feedstock list.

V-02 CAS Number: Enter the CAS Number for eac feedstock named. See the Appendix for feedstock CAS Numbers.

VI. **Sources of Information:** List the sources used to obtain information for this form. Sources cited may include: sample analysis, reports, inspections, official records, or other documentation. Sources cited provide the basis for information entered on the form and may be used to obtain further information about the site.

Part 3 Description of Hazardous Conditions and Incidents

*1. **Identification:** Refer to Part 1—I.

II. **Hazardous Conditions and Incidents:**

II-01 Hazards: Indicate each hazardous, or potentially hazardous, condition known, or claimed, to exist at the site.

II-02 Observed, Potential, or Alleged: Check Observed and enter the date, or approximate date, of occurrence if a release of contaminants to the environment, or some other hazardous incident, is known to have occurred. In cases of a continuing release, e.g., groundwater contamination, enter the date, or approximate date, the condition first became apparent. If conditions exist for a potential release, check potential. Check Alleged for hazardous, or potentially hazardous, conditions claimed to exist at the site.

II-03 Population Potentially Affected: For each hazardous condition at the site, enter the number of people potentially affected. For Soil enter the number of acres potentially affected.

II-04 Narrative Description: Provide a narrative description, or explanation, of each condition. Include any additional information which further explains the condition.

II-05 Description of Any Other Known, Potential, or Alleged Hazards: Provide a narrative description of any other hazardous, or potentially hazardous, conditions at the site not covered above.

III. **Total Population Potentially Affected:** Enter the total number of people potentially affected by the existence of hazardous, or potentially hazardous, conditions at the site. Do not sum the numbers shown for each condition.

IV. **Comments:** Other information relevant to observed, potential, or alleged hazards may be entered here.

V. **Sources of Information:** List the sources used to obtain information for this form. Sources cited may include: sample analysis, reports, inspections, official records, or other documentation. Sources cited provide the basis for information entered on the form and may be used to obtain further information about the site.

POTENTIAL HAZARDOUS WASTE
PRELIMINARY ASSESSMENT

General Information

The Potential Hazardous Waste Site, Preliminary Assessment form is used to record information necessary to make an initial evaluation of the potential risk posed by a site and to recommend further action.

The Preliminary Assessment form contains three parts:

Part 1 – Site Information and Assessment

Part 2 – Waste Information

Part 3 – Description of Hazardous Conditions and Incidents

Part 1 – Site Information and Assessment contains all of the data elements also contained on the Site Identification form required to add a site to the automated Site Tracking System (STS). It is therefore possible to add a site to STS at the Preliminary Assessment stage. Instructions are given below.

Part 2 – Waste Information and Part 3 – Description of Hazardous Conditions and Incidents are used to record specific information about substances, amounts, hazards, and targets, e.g., population potentially affected, that are used in determining the priority for further action. Parts 2 and 3 are also contained in the Potential Hazardous Waste Site, Site Inspection Report form where they may be used to update, add, delete, or correct information supplied on the Preliminary Assessment.

An Appendix with feedstock names and CAS Numbers and the most frequently cited hazardous substances and CAS bers is located behind the instructions for the Preliminary Assessment.

General Instructions

1. Complete the Preliminary Assessment form as completely as possible.

2. Starred items (*) are required before assessment information can be added to STS. The system will not accept incomplete assessment information.

3. To add a site to STS at the Preliminary Assessment stage, write "New" across the top of the form and complete items II-01, 02, 03, 04, and 06, Site Name and Location, and item III-13, Type of Ownership.

4. Data items carried in STS, which are identical to those on the Site Identification form and which can be added, deleted, or changed using the Preliminary Assessment form, are indicated with a pound sign (#). To ensure that the proper action is taken, outline the item(s) to be added, deleted, or changed with a bright color and indicate the proper action with "A" (add), "D" (delete), or "C" (change).

5. There are two options available for adding, deleting, or changing information supplied on the Preliminary Assessment form. The first is to use a new Preliminary Assessment form, completing only those items to be added, deleted, or changed. Mark the form clearly, using "A", "D", or "C", to ir ıte the action to be taken. If only data carried in STS are tc . altered, the Site Source Data Report may be used. Using the report, mark clearly the items to be changed and the action to be taken.

Detailed Instructions

Part 1 Site Information and Assessment

I. Identification: Identification (State and Site Number) is the site record key, or primary identifier, for the site. Site records in the STS are updated based on Identification. It is essential that State and Site Number are correctly entered on each form.

*I-01 State: Enter the two character alpha FIPS code for the state in which the site is located. It must be identical to State on the Site Identification form.

*I-02 Site Number: Enter the ten character alphanumeric code for sites which have a Dun and Bradstreet or EPA "user" Dun and Bradstreet number or the ten character numeric GSA identification code for federal sites. The Site Number must be identical to the Site Number on the Site Identification form.

II. Site Name and Location: If Site Name and Location information require no additions or changes, these items are not required on the Preliminary Assessment form. However, completing these items will facilitate use of the completed form and records management procedures.

#II-01 Site Name: Enter the legal, common, or descriptive name of the site.

#II-02 Site Street: Enter the street address and number (if appropriate) where the site is located. If the precise street address is unavailable for this site, enter brief direction identifier, e.g., NW intersection I-295 & US 99; Post Rd, 5 mi W of Rt. 5.

#II-03 Site City: Enter the city, town, village, or other municipality in which the site is located. If the site is not located in a municipality, enter the name of the municipality (or place) which is nearest the site or which most easily locates the site.

#II-04 Site State: Enter the two character alpha FIPS code for the state in which the site is located. The code must be the same as in item I-01.

#II-05 Site Zip Code: Enter the five character numeric zip code for the postal zone in which the site is located.

#II-06 Site County: Enter the name of the county, parish (Louisiana), or borough (Alaska) in which the site is located.

#II-07 County Code: Enter the three character numeric FIPS county code for the county, parish, or borough in which the site is located. (The regional data analyst will furnish this data item.)

#II-08 Site Congressional District: Enter the two character number for the congressional district in which the site is located.

II-09 Coordinates: Enter the Coordinates, Latitude and Longitude, of the site in degrees, minutes, seconds and tenths of seconds. If a tenth of a second is insignificant at this site, enter "0".

II-10 Directions to Site: Starting from the nearest public road, provide narrative directions to the site.

III. Responsible Parties

#III-01 Site Owner: Enter the name of the owner of the site. The site owner is the person, company, or federal, state, municipal or other public or private entity, who currently holds title to the property on which the site is located.

#III-02 -03 -04 -05 Site Owner Address: Enter the current complete business, residential, or mailing address at which the owner of the site can be reached.

III-06 Site Owner Telephone Number: Enter the area code and local telephone number at which the owner of the site can be reached.

#III-07 Site Operator: If different from Site Owner, enter the name of the operator at the site. The site operator is the person, company, or federal, state, municipal or other public or private entity, who currently, or most recently, is, or was, responsible for operations at the site.

#III-08 -09 -10 -11 Site Operator Address: Enter the current complete business, residential, or mailing address at which the operator of the site can be reached.

III-12 Site Operator Telephone Number: Enter the area code and local telephone number at which the operator of the site can be reached.

#III-13 Type of Ownership: Check the appropriate box to indicate the type of site ownership. If the site is under the jurisdiction of an activity of the federal government, enter the name of the department, agency, or activity. If Other is indicated, specify the type of ownership and name.

III-14 Owner/Operator Notification On File: Check the appropriate box(es) to indicate that the notification required by RCRA (3001) and/or CERCLA (103c, Superfund) have been received. If received, enter the date(s) received. Check none if not received.

IV Characterization of Potential Hazard

IV-01 On Site Inspection: Check the appropriate box to indicate that the site has been inspected or visited by EPA, a state or local official, or a contractor representative of EPA or a state or local government. Enter the date of the inspection. Check the appropriate box(es) to indicate who visited the site or performed the inspection. If the site visit was performed by a contractor, enter the name of the company.

*IV-02 Site Status: Check the appropriate box(es) to indicate the current status of the site. Active sites are those which treat, store, or dispose of wastes. Check Active for those active sites with an inactive storage or disposal area. Inactive sites are those at which treatment, storage, or disposal activities no longer occur.

IV-03 Years of Operation: Enter the beginning and ending years (or beginning only if operations at the site are on-going), e.g., 1878/1932, of waste treatment, storage, and/or disposal activities at the site. Check Unknown if the years of operation are not known.

IV-04 Description of Substances Possibly Present, Known, or Alleged: Provide a narrative description of hazardous, potentially hazardous, or other substances present, or claimed to be present, at the site.

IV-05 Description of Potential Hazard to Environment and/or Population: Provide a narrative description of the potential hazard the site poses to the environment and to exposed population or wildlife. If no hazard, or potential hazard, exists, provide the basis for that determination.

V. Priority Assessment

*V-01 Priority for Inspection: Check the appropriate box to indicate the priority for further action or inspection. If no further action is required, complete the Potential Hazardous Waste Site, Current Disposition form. The Priority for Inspection assessed must be supported by appropriate data in Part 2 – Waste Information and Part 3 – Description of Hazardous Conditions and Incidents of this form. If no hazardous conditions exist, Part 3 is not required.

VI. Information Available From

VI-01 Contact: Enter the name of the individual who can provide information about the site.

VI-02 Of: If appropriate, enter the name of the Public or private agency, firm, or company and the organization within the agency, firm, or company of the individual named as Contact.

VI-03 Telephone Number: Enter the area code and local telephone number of the individual named as contact.

VI-04 Person Responsible for Assessment: Enter the name of the individual who made the site assessment and assigned the priority rating to the site. The person responsible for the assessment may be different from the individual who prepared the form.

VI-05 Agency: Enter the name of the Agency where the individual who made the assessment is employed.

VI-06 Organization: Enter the name of the organization within the Agency.

VI-07 Telephone Number: Enter the area code and local telephone number of the individual who made the assessment.

VI-08 Date: Enter the date the assessment was made.

Part 2 Waste Information

***I. Identification**: Refer to Part 1—I.

II. Waste States, Quantities, and Characteristics: Waste States, Quantities, and Characteristics provide information about the physical structure and form of the waste, measures of gross amounts at the site, and the hazards posed by the waste, considering acute and chronic health effects and mobility along a pathway.

*II-01 Physical States: Check the appropriate box(es) to indicate the state(s) of waste present, or thought to be present, at the site. If Other is indicated, specify the physical state of the waste.

*II-02 Waste Quantity at Site: Enter estimates of amounts of waste at the site. Estimates may be in weight (Tons) or volume (Cubic Yards or Number of Drums). Use as many entries as are appropriate; however, measurements must be independent. For

A. GENERAL INFORMATION

SITE: Columbine Landfill TDD NO: _____

WSTS NO: _____

LOCATION: WELD CO. RDS 5 AND 6; SEC 29 T1NR68W

PLAN PREPARED BY: Scott Winters DATE: May 25, 1984

APPROVED BY: Cindy Jones DATE: 6-8-84

OBJECTIVE(S): To perform a site investigation which includes sampling of surface water impoundments and groundwater wells

PROPOSED DATE OF INVESTIGATION: JUNE 12 + 13, 1984

BACKGROUND REVIEW: Complete: ____ Preliminary: X

DOCUMENTATION/SUMMARY: OVERALL HAZARD: Serious: ____ Moderate: X

Low: ____ Unknown: ____

B. SITE/WASTE CHARACTERISTICS

WASTE TYPES(S): Liquid ✓ Solid ✓ Sludge ✓ Gas ____

CHARACTERISTIC(S): Corrosive ✓ Ignitable ✓ Radioactive ____

Volatile ____ Toxic ✓ Reactive ____ Unknown ____ Other (Name) ____

FACILITY DESCRIPTION: A 195-acre landfill now accepting primarily nonhazardous refuse and garbage from residential, commercial and industrial sources. Also ~~SAND TRAP WASTE~~ LANDSPREADING

Principal Disposal Method (type and location): LANDFILL, LANDSPREADING (ON ~~INACTIVE~~ EXCAVATION OR INTERMEDIATE COVER SURFACES

Unusual Features (dike integrity, power lines, terrain, etc.) ____

~~2 SURFACE RUNOFF COLLECTION PONDS, ONE LEACHATE COLLECTION POND~~

Status: (active, inactive, unknown) Active

History: (Worker or non-worker injury; complaints from public; previous agency action): BURNING DUMP IN LATE '60's, SHUT 1970

LANDFILL DEVELOPED ADJACENT TO OLD DUMP IN 1980

LANDFILL EXPANSION ONTO OLD DUMP SITE 1983

~~CITED FOR OFFSITE DISCHARGE MAY 1983; PONDS CONSTRUCTED IN RESPONSE TO CITATION~~

OLD PRE 1970 BURNING DUMP ACCEPTED DRUMMED CHEMICAL WASTES FROM IBM AND OTHERS.

C) Hazards Evaluation

This site is an active landfill with daily truck traffic including private vehicles. Also on site are heavy earth moving equipment which may be active at the time of our site visit. To be sampled are 5 monitoring wells require purging prior to sampling and because these wells are variable in depth we anticipate a minimum of 1½ to 2 working days on site. We will also sample a minimum of two surface water ponds on or near the site.

D. SITE SAFETY WORK PLAN

PERIMETER ESTABLISHMENT: Map/Sketch Attached X Site Secured? Yes
Perimeter Identified? X Zone(s) of Contamination Identified? No

PERSONAL PROTECTION

Level of Protection: A ___ B ___ C ___ D X
Modifications: At this site respirators will not be worn ~~unless exceeded~~ All other equipment will be utalized as ~~standard~~ sampling procedures.
Surveillance Equipment and Materials: H-Nu, Sampling bottles, shovel, bailer, coolers, mobile phone, pH meter, conductivity meter, submersible pump, 5 Steel Bucket and funnel, camera, rope, gloves, vermiculite, ~~bottles~~ pond sampler

Special Equipment, Facilities, or Procedures: Filtration equipment for inorganic's. DI water, Alconox soap, acetone, brushes ~~for~~ and tap water for decontamination of sampling equipment.

SITE ENTRY PROCEDURES: Contact site owner/operator to obtain permission for the site investigation

Team Member	Responsibility
Scott Winters CDH	Team Leader
Dennis Hotovec CDH	Team member
Mark Mullis E&E	Tech. Assistance

WORK LIMITATIONS (Time of day, etc.): Daylight hours from 8 am to 4 30/pm

INVESTIGATION-DERIVED MATERIAL DISPOSAL: On-site

LOCAL RESOURCES

Ambulance _____

Hospital Emergency Room 651-5111 (Longmont United Hospital), Boulder Memorial - 651-3104

Poison Control Center 629-1123

Police 828-3200

Fire Department 828-3883

Airport _____

Explosives Unit _____

EPA Contact _____

SITE RESOURCES

Water Supply Water Well on site

Telephone Will determine if ~~one~~ one is located on site during visit

Radio _____

Other _____

EMERGENCY CONTACTS

1.

2.

3.

4.

5.

6.

7.

8.

9.

10.

(Gi oad or other directions; att map)

HOSPITAL: _____

_____

_____

OTHER: _____

_____

_____

_____

_____

_____

_____

_____

_____

ATTACHMENT B

3/23/84

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

EPA

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D950635379

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
COLUMBINE LANDFILL (PRATT PROPERTY)	1750 WELD COUNTY ROAD 6.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
FOIE (?)	CO	80516	WELD	123	CO-04

09 COORDINATES LATITUDE	LONGITUDE	
40 42 04.0	105 01 22.0	NE¼ NE¼ SEC 29 T1N R68W

10 DIRECTIONS TO SITE (Starting from nearest public road)
WEST FROM INTERSTATE 25 TO WELD COUNTY ROAD 7; NORTH 2 MILES TO WELD COUNTY ROAD 6; WEST ABOUT ½ MILE TO LANDFILL ENTRANCE

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
KENNETH PRATT	1921 PANORAMA CIRCLE

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER	WORK
LONGMONT	CO	80501	(303) 776-6822	776-4495

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
KIERNES CORPORATION	1333 WEST 120TH SUITE 210

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
NORTHGLENN	CO	80234	(303) 450-2755

13 TYPE OF OWNERSHIP (Check one)
☑ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☐ A. RCRA 3001 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☑ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: 6 10 81 (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON-SITE INSPECTION
☑ YES DATE 3 2 84 (MONTH DAY YEAR)
☐ NO

02 (Check all that apply)
☐ A. EPA ☐ B. EPA CONTRACTOR ☑ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)
CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)	03 YEARS OF OPERATION		
☑ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1965(?) (BEGINNING YEAR)	PRESENT (ENDING YEAR)	☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN OR ALLEGED
- SOLVENTS AND UNSPECIFIED ORGANICS } IBM CONTRIBUTED 84000 GALLONS IN ABOUT 1500
- INORGANICS } 55-GALLON DRUMS FROM 1965 TO 1969
- ACIDS, BASES
- SMALL QUANTITIES HAZARDOUS WASTE MIXED W/ INDUSTRIAL, COMMERCIAL, AND RESIDENTIAL REFUSE.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
- POTENTIAL SHALLOW GROUNDWATER AND SURFACE WATER CONTAMINATION
- ASBESTOS DISPOSAL (UNTIL 3/15/84)

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☑ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
MARK PARSONS-IBM (303) 447-7764; STEVE ORZYNSKI	COLORADO LANDFILL INC.	(303) 450-2755

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
NED NOACK	STATE	DEPT. HEALTH	(303) 320-8333	3 23 84 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D980635379

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER (Specify)
- ☐ E. SLURRY
- ☑ F. LIQUID (?)
- ☐ G. GAS

02 WASTE QUANTITY AT SITE
(Measures of waste quantities must be independent)

TONS _____

CUBIC YARDS _____

NO. OF DRUMS FILED

03 WASTE CHARACTERISTICS (Check all that apply)

- ☑ A. TOXIC
- ☑ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☑ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS ✓			primarily MEK, MIBK, CYCLOHEXANONE
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS ✓			
IOC	INORGANIC CHEMICALS ✓			
ACD	ACIDS ✓			
BAS	BASES ✓			
MES	HEAVY METALS			TOTAL OF ± 84000 GALLONS IN 1500 DRUMS FROM 1965-1969.

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
CO	D980635279

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☑ A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☑ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
KNOWN SOLVENT DISPOSAL OCCURRED AT THIS SITE, BUT CONTAMINANTS FROM THOSE SOLVENTS HAVE NOT BEEN FOUND IN MONITOR WELLS AS YET

01 ☑ B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☑ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
THE SHALLOW ALLUVIAL GROUNDWATER EVENTUALLY DISCHARGES AND WOULD FLOW TOWARDS COAL CREEK, ABOUT ½ MILE WEST OF THE SITE

01 ☐ C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: 3/2/84) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: _____ (Acres)
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

01 ☐ I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____
02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
NOT OBSERVED

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE: CO | 02 SITE NUMBER: D980683473

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

NOT OBSERVED

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES (Spills/runoff/standing liquids/leaking drums) — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

NOT OBSERVED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

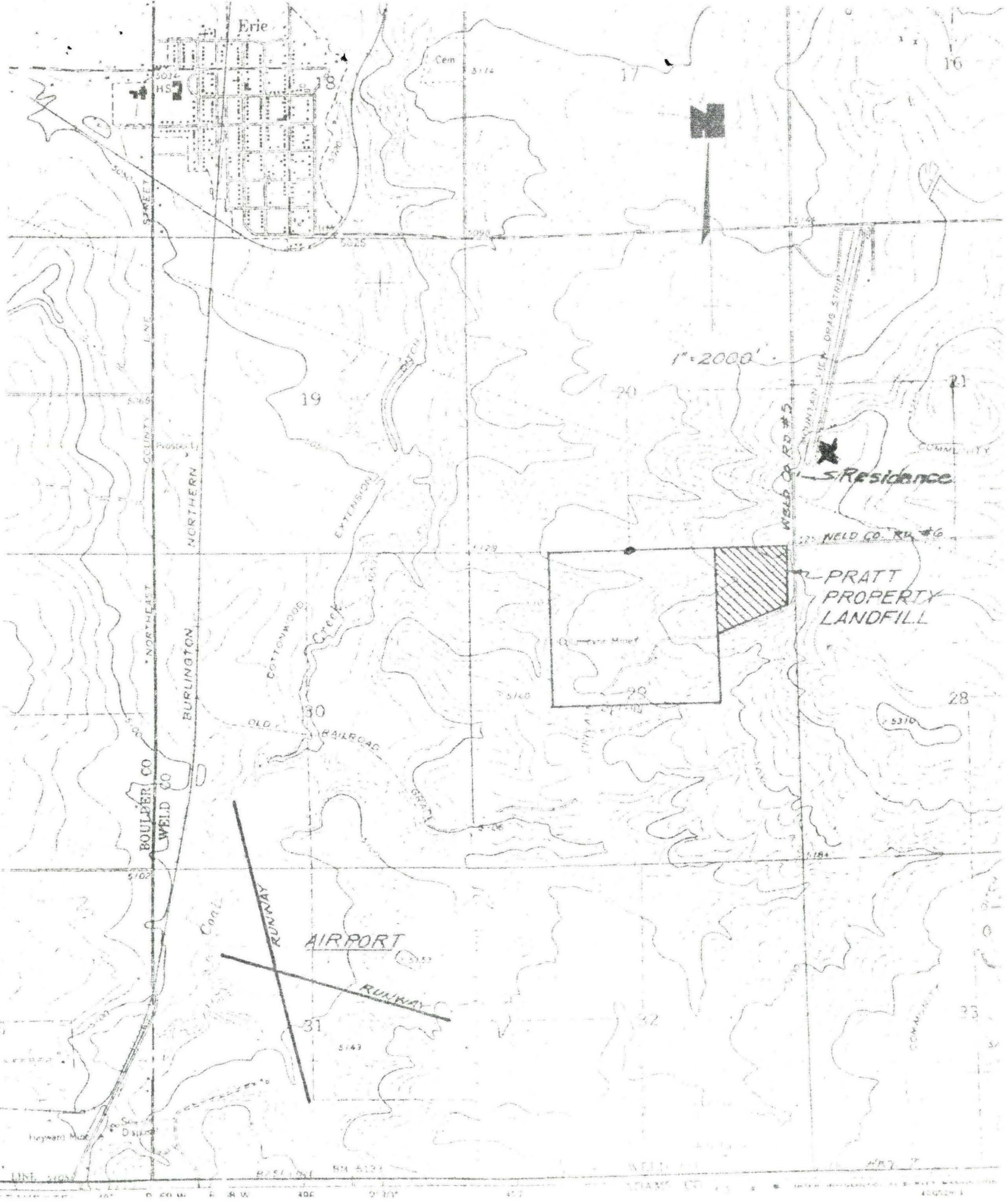
III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

IBM CONTACT MARK PARSONS (303) 447-7764
OTHER NOTIFICATIONS FROM:
BROWNING FERRIS INDUSTRIES OF COLORADO - JOHN THOMASSON, DISTRICT MGR (303) 892-6285
WESTERN DISPOSAL INC. - DANNY L. SOUDERS, PRESIDENT (303) 444-2037

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

CDH/WMD WELD CO. SW FILES, APCD files
EPA NOTIFICATION OF HAZARDOUS WASTES



VICINITY MAP

COLORADO DEPARTMENT HEALTH 4210 East 11th Ave - Denver, CO. 80220

File Copy

Transmittal N.O.C.

COLORADO DEPARTMENT OF HEALTH

Richard D. Lamm
Governor

Frank A. Traylor, M.D.
Executive Director

June 11, 1984

Kerns Corporation
1333 West 120th
Suite 210
Northglenn, Colorado 80234

Attention: Steve Orzynski

RE: Proposed 3012 RCRA Site Investigation

Dear Mr. Orzynski:

As requested, enclosed you will find a map indicating the proposed sampling locations as of this date. Also enclosed is a copy of the proposed sampling procedures and a listing of the priority pollutants, highlighted in yellow which are scheduled for analysis by this Division.

If you have any questions regarding these issues please contact me at 320-8333 ext. 6333.

Sincerely,

Scott H. Winters
Geologist
Waste Management Division

SHW:pb

Enclosures as stated

cc: Tom Staible, EPA

Prepared by: SHW
Date: 6/11/84

Approved by: [signature]
Date: 6-11-84

Legal Concurrence:
Date:

Executive Director's Action:

Signed:

Date Mailed:

Returned unsigned:

Date: